

Before the
Administrative Hearing Commission
State of Missouri



ROBIN WRIGHT-JONES and
WRIGHT-JONES FOR MISSOURI,

Petitioners,

vs.

MISSOURI ETHICS COMMISSION,

Respondent.

No. 13-0926 EC

DECISION

Robin Wright-Jones and her candidate committee, Wright-Jones for Missouri (the “Committee,” together with Wright-Jones, the “Petitioners”), violated several provisions of Missouri’s campaign finance disclosure laws as found in Chapter 130, RSMo. Based on the evidence presented at hearing, we find and summarize the violations of Chapter 130 as follows:

- Petitioners failed to timely amend the statement of committee organization when the official fund depository account changed.
- Petitioners failed to timely file campaign finance reports of contributions and expenditures, and filed reports with incorrect information.
- Petitioners did not timely, accurately and sufficiently report contributions and expenditures, and improperly accepted anonymous contributions in excess of statutory limits.
- Petitioners made cash expenditures in excess of statutory limits.

- Petitioners failed to file a required independent contractor supplemental report pertaining to expenditures for certain services.
- Petitioners used campaign contributions to make expenditures for which Wright-Jones was reimbursed by the Missouri Senate.

We find that that the imposition of fees and the making of orders related to the violations are appropriate, and set out the specifics below.

Commissioner Karen A. Winn, having read and personally considered the portions of the record cited or referred to in the parties' written arguments, renders the decision. § 536.080.2, RSMo 2000; *Angelos v. State Bd. of Regis'n for the Healing Arts*, 90 S.W.3d 189 (Mo. App., S.D. 2002).

Procedure

Respondent Missouri Ethics Commission ("MEC") issued a final decision and order on May 14, 2013, finding that Petitioners violated Missouri's campaign finance disclosure laws, and ordering them to pay certain fees for the violations. Petitioners appealed to the Administrative Hearing Commission on May 29, 2013, and amended their complaint on the same day.

The MEC filed its answer on June 28, 2013 and on the same day filed a motion to strike certain portions of the amended complaint. We sustained the motion in part on July 29, 2013, striking paragraphs subparagraphs 5e, 5i, and 5m of the amended complaint.

On December 5, 2013, we convened a hearing. Petitioners were represented by counsel Bernard Edwards, Jr., and Wright-Jones appeared in person. The MEC was represented by attorney Curtis Stokes. The matter became ready for our decision on March 31, 2014, when the last written argument was filed.

Evidentiary Issues

At hearing, the MEC offered several volumes of exhibits. Petitioners lodged several oral objections to most of them. We admitted the exhibits, subject to the objections, and agreed to examine the objections in further detail once the parties addressed them via written argument.

The written argument of MEC did not address the evidentiary objections, so we review the written argument filed on behalf of Petitioners as it relates to certain evidentiary matters at the hearing. We consider and rule upon the record objections before turning to our findings of fact and conclusions of law.

MEC Exhibits 1, 2, 12, and 13 through 33A

Exhibit 12 is a business records affidavit from the custodian of records for the MEC concerning Exhibits 1, 2, and 13 through 33A. Exhibits 1 and 2 are a “statement of committee organization” and an amended “statement of committee organization” that Petitioners filed with the MEC. Exhibits 13 through 33A are campaign finance disclosure reports, amended campaign finance disclosure reports, and supplemental campaign finance disclosure reports on file with the MEC.

Petitioners objected that the custodian of records for the MEC did not “follow state statute with regard to the inclusion of documents that were not prepared or were not sent to the Missouri Ethics commission and that in those documents there are interpretations of records.”¹ In their written argument, Petitioners expound upon the oral objection that some of the exhibits are not proper business records of the MEC under § 536.070(5), RSMo.² In support of this argument, they cite *Missouri Church of Scientology v. State Tax Commission*, 560 S.W.2d 837, 839 (Mo. banc 1977), for the proposition that third party business records, those made and maintained in the offices of a non-agency entity, cannot properly be considered admissible evidence as agency records under § 536.070(5).

¹ For purposes of this section of our decision, we rely mainly upon the transcript of the hearing for summarizing the oral objections of the petitioners. Their written argument simply references their objections to MEC’s Exhibits 1 – 157 “throughout the hearing.”

² Statutory references are to the Revised Statutes of Missouri, RSMo Supp. 2013, unless otherwise noted.

Church of Scientology does not stand for the proposition urged by the Petitioners. Rather, the admission of business records at an administrative hearing is governed by § 536.070(10), under which such records are admissible “if it shall appear that it was made in the regular course of any business, and that it was the regular course of such business to make such ... record at the time of such ... transaction ... or within a reasonable time thereafter.” Furthermore, we may determine “from the totality of the circumstances whether the document meets the criteria; the document's custodian or preparer need not be present to sponsor the document.” *State ex rel. Sure-Way Transp., Inc. v. Division of Transp. Dept. of Economic Development, State of Mo.* 836 S.W.2d 23, 26 -27 (Mo.App. W.D.1992). As the court in *Sure-Way* noted, § 536.070(10) further provides that “All other circumstances of the making of such ... record, *including the lack of personal knowledge* by the entrant or maker, may be shown to affect the weight of such evidence, but such showing shall not affect its admissibility.”

Most of the records at issue are reports that Petitioners were required to submit to the MEC and that the MEC was required to keep. *See* § 130.021.5 (committee organization records); § 130.041 (campaign finance disclosure reports); § 130.026.2(2) (appropriate officer for state senate reports is the MEC). The records submitted were in the custody of the MEC and are its business records. To the extent they were not, such as the Committee’s bank records, they are admissible under § 536.070(10) and *Sure-Way*.

Petitioners additionally object that Exhibits 1, 2, and 13 through 33A contain legal conclusions of the MEC. While we do not agree that improper legal conclusions of the agency are made in the records, this Commission is charged with independently making conclusions of law based on the evidence before us. *See Kennedy v. Missouri Real Estate Commission*, 762 S.W.2d 454, 456-57 (Mo. App. E.D. 1988). To the extent any such legal conclusions may be contained in those exhibits, we will not defer to them.

We overrule the objections and admit Exhibits 1, 2, 12, and 13 through 33A.

MEC Exhibits 3 and 4

Exhibit 3 is a copy of the November 4, 2008 general election results for State Senate, District 5. Exhibit 4 is a copy of the election results for the August 27, 2012 primary election for State Senate Districts 1, 3, 5, 7, 9, and 11. Neither exhibit is certified. The MEC argues that we may take judicial notice of the results. Petitioners object that the results are not certified and are therefore inadmissible and that the results are not relevant.

We believe the election results to be relevant to our decision and we note that this Commission is permitted to take “official notice of all matters of which courts take judicial notice.” § 536.070(6). Courts may take judicial notice of election returns. *Mayes v. Palmer*, 103 S.W. 1140, 1141-42 (Mo. 1907) (“state courts judicially know the date of holding a general election or a special election provided for by a general law ... and the result of the election as shown by the official returns”). The results need not be certified to be subject to notice. We therefore overrule the objections and take official notice of the results of the November 4, 2008 general election and the August 7, 2012 primary election for Senate District 5.

MEC Exhibit 5

Exhibit 5 is an affidavit made by Rochelle Tilghman, the Committee’s treasurer from May 16, 2007 until July 14, 2011. Petitioners object to the affidavit because they cannot cross-examine the affiant. The MEC argues that the Petitioners did not timely make objections, and therefore waived them, pursuant to § 536.070(12).

Section 536.070(12) allows for admission of affidavits in a contested cases under certain conditions. First, it requires such affidavits to be served on all parties. Second, it provides that an opposing party may file objection to the affidavit within seven (7) days of service. In the

event an objection is filed, the affidavit may not be used except “in ways that would have been permissible in the absence of this subsection.” Section 536.070(12) specifically states that

Failure to serve an objection ... shall constitute a waiver of all objections to the introduction of such affidavit ... on the ground that it is in the form of an affidavit, or that it constitutes or contains hearsay evidence, or that it is not, or contains matters which are not, the best evidence, but any and all other objections may be made at the hearing.

On October 8, 2013, the MEC served the affidavit on Petitioners, providing notice of its intent to introduce it at the hearing. No written objection was filed, and Petitioners first made their objection known at the hearing on December 5, 2013, nearly two months after being served a copy.

Petitioners argue that the statutory procedure governing admission of the affidavit violates their right to cross-examine the maker in accordance with the Ninth and Fourteenth Amendments to the Constitution. This Commission is an executive branch tribunal and lacks the authority to rule on the constitutionality or any other alleged infirmity of statutory law and must simply apply § 536.070(12) as written. *Cocktail Fortune v. Supervisor of Liquor Control*, 994 S.W.2d 955, 957 (Mo. banc 1999).

We overrule the objection and admit Exhibit 5.

MEC Exhibits 6, 7, and 34 through 81

Despite the statement in Petitioners’ written argument to the contrary, no oral objection was made to these certified business records at the hearing, and they were admitted. Although not properly preserved for argument, we believe Petitioner was referring to these records in stating that the certified bank records contained in these exhibits were inadmissible because they were not agency records pursuant to § 536.070(5). The argument ignores that admission of

business records of non-agency entities in hearings before this Commission is governed by § 536.070(10), as previously discussed.

MEC Exhibits 82 and 83 through 139

Exhibit 82 is a business records affidavit of Jim Howerton, custodian of records for the Missouri Senate, authenticating Exhibits 83 through 85, Wright-Jones' expense reports for 2009, 2010, and 2011, respectively; and authenticating Exhibits 86 through 139, Wright-Jones' expense reimbursement forms submitted to the Senate.

Petitioners object to "any interpretation [reflected in the documents] by the Missouri Ethics Commission about the . . . rules and regulations of the Missouri Senate with regard to reimbursement."³ We are obligated to make independent findings of fact and conclusions of law and do so without deference to the conclusions of the MEC; however, we see no references or notations in these exhibits that relate to the rules and regulations of the Missouri Senate.

We overrule the objection and admit Exhibits 82-139 as properly authenticated business records of the Senate under § 536.070(10).

MEC Exhibits 140, 141-142, 144-147, 149-155, and 157

Exhibit 140 is a business records affidavit, authenticating Exhibits 141, 142, 144-147, 149-155, and 157, which are comprised of documents created by the MEC staff during its investigation.

Petitioners object to them on the basis that the MEC's custodian of records was new to the MEC when he executed the affidavit and therefore did not have personal knowledge of those records belonging to the MEC.⁴ We have reviewed the affidavit and find that it attests only that the records custodian knows the records to be those of the agency and not that he has personal

³ Tr. 30.

⁴ Tr. 32.

knowledge of the content of those records. Consistent with our previous discussion on a similar point, the exhibits are admissible pursuant to § 536.070(10), so we overrule the objection, and weigh their evidentiary value accordingly.

Petitioners also object to Exhibits 141, 142, 144-147, 149-155, and 157 on the grounds that the exhibits are superfluous, irrelevant, and immaterial and that MEC's investigative supervisor, Ron Getty, may not give conclusions about the investigative records prepared under his supervision. An objection was also made that Getty was not a Certified Public Accountant and could therefore not perform any audit functions for the MEC or testify regarding his conclusions about campaign finance records reviewed. Petitioners provided no authority for the assertion that Getty was required to be a CPA in order to perform his duties to the MEC and we find none. In fact, §105.961.1 authorizes the MEC to hire a special investigator or rely upon its own staff to perform the investigative or audit function but lists no specific qualifications that must be possessed by such an investigator. The investigator's function is to perform the audit and prepare a report, which serves to inform the MEC about the conduct being investigated. Moreover, the reliance upon direct supervisors and prepared summaries to encapsulate large volumes of documentary evidence, provided the underlying documents are available to the tribunal and opposing party for purposes of cross-examination, is so crucial to trial convenience that rejection of such evidence may constitute reversible error. *Chicago & Northwestern Transp. Co. v. Barclay-Moore Co.*, 688 S.W.2d 805, 807-08 (Mo. App. W.D. 1985).

These exhibits detail the alleged campaign finance violations at issue in this case. They are relevant and material. Exhibits 141, 142, 144-147, 149-155, and 157 also contain the investigative summaries of information that Getty and his staff obtained from the campaign finance reports and bank statements. And under § 536.070(11), the results of audits and studies involving examination of many records are admissible so long as they are made under the

supervision of a qualified witness that is available at the hearing for cross-examination. Based on the foregoing, we overrule the objections and accept the exhibits as an aid to our understanding of the evidence.

MEC's Exhibits 140, 141-142, 144-147, 149-155, and 157 are admitted.

Findings of Fact

Background

1. The MEC is an agency of the State of Missouri established pursuant to § 105.955, in part for the purpose of enforcing the provisions of Chapter 130.
2. Wright-Jones won election to the State Senate at the general election on November 4, 2008 and thereafter served a term of 4 years representing District 5. Wright-Jones ran in the primary election for the same office on August 7, 2012 and lost.
3. Wright-Jones for Senate was the name given the candidate committee formed by Wright-Jones to support her candidacy in 2008 and future elections. The name was changed to Wright-Jones for Missouri in July 2011.⁵
4. Rochelle Tilghman served as the treasurer of the Committee from 2007 to July 14, 2011. She became ill in 2009 and stopped filing reports with the MEC after January 16, 2010.
5. Angelia Elgin served as the Committee's treasurer from July 14, 2011 to March 16, 2012.
6. Under the authority of § 105.961, the MEC's staff investigated the campaign finance records, MEC reports, bank statements, and other records of Petitioners and reported investigative findings to the MEC.

⁵ For the sake of simplicity, we refer to both candidate committees as the "Committee" throughout our decision.

7. Based on the report of its staff, the MEC determined there were reasonable grounds to believe that violations of the law had occurred, and the MEC convened a hearing pursuant to § 105.961.3.

8. On May 14, 2013, the MEC issued its Findings of Fact, Conclusions of Law, and Order, finding probable cause that Petitioners violated Chapter 130, RSMo, Missouri's campaign finance disclosure law. The MEC's order imposed a fee totaling \$239,308 against Petitioners for Counts 1 through 4 and 6 (reporting violations) of the complaint pending before the MEC, permitting them to pay 10 % (or \$23,930) of that fee on certain conditions; a fee of \$14,414 for Count 5 (use of cash expenditures); a fee of \$14,069 for Count 7 (personal use); and a fee of \$3,789 for Count 8 (unauthorized use).

Count I—Failure to timely amend statement of organization

9. Petitioners originally reported an account ending in the number *4009 with the St. Louis Community Credit Union as their official depository account.

10. Petitioners opened an account ending in the number *6695 with the St. Louis Community Credit Union on or about February 10, 2011, but did not file an amended statement of committee organization with the MEC within 20 days, disclosing that the second official depository account had been opened.

11. On or about April 8, 2011, Petitioners transferred all funds remaining in account *4009 into account *6695 and closed *4009, but they did not file an amended statement of committee organization with the MEC within 20 days of this event.

12. On July 14, 2011, Petitioners filed an amended statement of committee organization that identified the Committee's new treasurer, but provided no information about the official depository account for the Committee.

Count II—Failure to timely file disclosure reports;
Incorrect reporting periods; Incorrect reporting of cash on hand

Failure to timely file disclosure reports

13. Petitioners did not file an October 2010 quarterly disclosure report.⁶

Respondent's Exhibit 13.

14. Petitioners filed the following disclosure reports untimely:

Reports filed untimely				
Report	Due	Filed	Days Late	Exhibit
April 2008 quarterly	4/15/08	4/16/08	1	<i>Exhibit 14</i>
30 day after primary	9/4/08	10/15/08	41	<i>Exhibit 17</i>
October 2008 quarterly	10/15/08	10/16/08	1	<i>Exhibit 18</i>
8 Days before general November 2008	10/27/08	11/23/08	27	<i>Exhibit 19</i>
April 2009 quarterly	4/15/09	4/24/09	9	<i>Exhibit 22</i>
October 2009 quarterly	10/15/09	10/16/09	1	<i>Exhibit 24</i>
January 2010 quarterly	01/15/10	1/16/10	1	<i>Exhibit 25</i>
April 2010 quarterly	4/15/10	8/29/10	136	<i>Exhibit 26</i>
July 2010 quarterly	7/15/10	8/29/10	45	<i>Exhibit 27</i>
April 2011 quarterly	4/15/11	5/31/11	45	<i>Exhibit 30</i>
October 2011 quarterly	10/15/11	10/17/11	2	<i>Exhibit 32</i>

Respondent's Exhibit 142; Tr. 48:6-12.

Incorrect reporting period

15. Petitioners excluded one day, October 23, 2008, from the reporting period for the “8 Day Before” report for the November 2008 general election. *Respondent's Exhibit 19.*

Insufficient reporting of cash on hand

16. As the report was originally filed, Petitioners reported cash on hand at the end of the April 2010 quarterly reporting period as \$95,847.69. *Respondent's Exhibit 26 at 2;*
Respondent's Exhibit 141; Tr. at 43-44.

⁶ A disclosure report is “an itemized report of receipts, expenditures and incurred indebtedness which is prepared on forms approved by the Missouri ethics commission and filed at the times and places prescribed[.]” §130.011(14).

17. As the report was originally filed, Petitioners reported cash on hand at the beginning of the April 2011 quarterly reporting period as \$211.74. *Respondent's Exhibit 30 at 2; Respondent's Exhibit 141; Tr. at 44.*

18. In between the April 2010 quarterly report and the April 2011 quarterly report, Petitioners originally filed, in lieu of full disclosure reports, a statement of limited activity in which they certified that neither the aggregate amount of contributions received nor the aggregate amount of expenditures made by the Committee exceeded \$500. *Respondent's Exhibit 27.*

19. Petitioners' campaign finance reports contained no explanation for the \$95,635.95 cash-on-hand difference between the April 2010 and April 2011 quarterly reports.

Count III—Contributions

Contributions not timely reported

20. The MEC's "Contributions and Loans Received" form instructs filers to report "ITEMIZED CONTRIBUTIONS RECEIVED FROM COMMITTEES REGARDLESS OF THE AMOUNT, OR FROM PERSONS GIVING MORE THAN \$100 TO A COMMITTEE." *E.g., Respondent's Exhibit 16A at 4.*

21. In all, Petitioners failed to timely disclose \$69,092.00 in contributions for which the contributor gave more than \$100 in the aggregate. A table of contributions not timely reported is contained in Appendix A and incorporated by reference into this decision.

22. Petitioners amended several disclosure reports in August and September 2011, after the MEC began its investigation and review, and those amended reports included most of the contributions referenced in the preceding paragraph. *Respondent's Exhibit 144; Tr. at 62.* The amended reports were filed as set forth below.

Filing dates of amended reports

Report	Original Filed	Amended Filed
July 2008 Quarterly	Jul. 15, 2008 <i>Ex. 15</i>	Aug. 19, 2011 <i>Ex. 15A</i>
8 Day Before August 2008 Primary	Jul. 24, 2008 <i>Ex. 16</i>	Aug. 22, 2011 <i>Ex. 16A</i>
30 Day After August 2008 Primary	Oct. 15, 2008 <i>Ex. 17</i>	Aug. 28, 2011 <i>Ex. 17A</i>
October 2008 Quarterly	Oct. 16, 2008 <i>Ex. 18</i>	Aug. 29, 2011 <i>Ex. 18A</i>
8 Day Before November 2008 General	Nov. 23, 2008 <i>Ex. 19</i>	Aug. 29, 2011 <i>Ex. 19A</i>
30 Day After November 2008 General	-	Aug. 29, 2011 <i>Ex. 20</i>
July 2009 Quarterly	Jul. 15, 2009 <i>Ex. 23</i>	Aug. 30, 2011 <i>Ex. 23A</i>
October 2009 Quarterly	Oct. 16, 2009 <i>Ex. 24</i>	Sep. 2, 2011 <i>Ex. 24A</i>
January 2010 Quarterly	Jan. 16, 2010 <i>Ex. 25</i>	Sep. 6, 2011 <i>Ex. 25A</i>
April 2010 Quarterly	Aug. 29, 2010 <i>Ex. 26</i>	Sep. 13, 2011 <i>Ex. 26A</i>
July 2010 Quarterly	Aug. 29, 2010 <i>Ex. 27</i>	Sep. 14, 2011 <i>Ex. 27A</i>
April 2011 Quarterly	May 31, 2011 <i>Ex. 30</i>	Sep. 14, 2011 <i>Ex. 26AA</i>

In addition, Petitioners filed certain amended disclosure reports in November 2011 and April 2012 that are not included in the table set forth above.

23. However, Petitioners did not include in those amended reports the following \$4,242.00 in contributions received:

Contributions Not Reported on Amended Reports		
Contributor	Date	Amount
Home Building Industry PAC	9/22/2008	\$500.00
Missouri Professionals Mutual	9/22/2008	\$675.00
Group Health Plan	10/7/2008	\$500.00
Consulting Engineers Council of MO/PAC	11/5/2008	\$500.00
Altria Client Services Inc	11/5/2008	\$1,000.00
Johnny Investment Inc	11/20/2008	\$1,067.00
	Total	\$4,242.00

Respondent's Exhibit 144; Tr. at 50-51.

Contributions reported but not deposited into official depository account

24. Petitioners reported the following \$3,475.00 in contributions of more than \$100 that were not deposited into Petitioners' official depository accounts:

Contributions reported but not deposited into official depository account			
Contributor	Date	Amount	Reported
Michael Wesley Jones	7/31/2008	\$300.00	Amended 30 Day After Primary, filed August 5, 2008
Missouri Credit Union Association	9/22/2008	\$675.00	Amended October 2008 quarterly
Missouri Physical Therapy of MO PAC	10/22/2008	\$500.00	Amended 8 Day Before General, filed November 4, 2008
International Association of Fire Fighters	12/4/2009	\$500.00	Amended January 2010 quarterly
Health Care Leadership Comm.	12/4/2009	\$500.00	Amended January 2010 quarterly
Altria Client Services, Inc.	12/4/2009	\$1,000.00	Amended January 2010 quarterly
	Total	\$3,475.00	

Respondent's Exhibit 145; Tr. at 65:5-13.

25. Between the July 2008 quarterly report and the amended April 2010 quarterly report, Petitioners reported a total of \$7,685 in contributions of \$100 or less, but depository account records show only \$3,140 in deposits attributable to such contributions:

Contributions \$100 or less – reported vs. deposited			
Report	Reported	Deposited in bank	Difference
Amended July 2008 quarterly	\$2,390.00	\$720.00	\$1,670.00
Amended October 2008 quarterly	\$400.00	\$250.00	\$150.00
Amended 30 Day After, Nov. 2008 General Election	\$3,345.00	\$1,170.00	\$2,175.00
Amended October 2009 quarterly	\$850.00	\$650.00	\$200.00
Amended January 2010 quarterly	\$400.00	\$350.00	\$50.00
Amended April 2010 quarterly	\$300.00	\$0.00	\$300.00
TOTAL	\$7,685.00	\$3,140.00	\$4,545.00

Respondent's Exhibit 146; Tr. 65-66.

Inaccurate reporting of contribution over \$100

26. Petitioners inaccurately reported a \$1,000 contribution from John Bardgett, *Respondent's Exhibit 40 at 55*, as a \$500 contribution on the amended "8 Day Before" November 2008 general election report. *Respondent's Exhibit 19A at 6.*

Anonymous contributions

27. Petitioners reported a \$650 contribution as coming from “unknown,” *Respondent’s Exhibit 16A at 8*, and a \$325 contribution as coming from “unknown,” *Respondent’s Exhibit 17A at 8*, on the amended “8 Day Before” and “30 Day After” 2008 Primary reports, respectively.

Missing address, employer, or occupation information

28. For 92 contributions totaling \$53,225 for which the contributor gave in the aggregate more than \$100, Petitioners either failed to report the contributor’s address or the contributor’s employer or occupation, or both. *Respondent’s Exhibit 147; Tr. at 69:5-21*. Of those, 35 contributions totaling \$26,222.00 lacked address information.

Count IV—Expenditures

Expenditures not timely reported

29. Petitioners did not timely disclose \$146,839.11 in expenditures, as set forth in Appendix B, which is incorporated by reference into this decision. *Respondent’s Exhibit 149; Tr. at 73-74*.

30. Investigators compared Petitioners’ amended disclosure reports filed in August and September 2011, after the MEC began its audit, and those amended reports included most of the expenditures listed in Appendix B. *Respondent’s Exhibit 149; Tr. at 62*.

31. However, Petitioners’ amended reports still omitted the following \$830.13 in expenditures made:

Expenditures Not Reported on Amended Reports		
Payee	Date	Amount
Cash Disbursed	7/26/2008	\$400.00
Cash	7/30/2008	\$200.00
Cash	9/25/2008	\$125.00
Hilton	12/10/2008	\$105.13

Expenditures Not Reported on Amended Reports		
Payee	Date	Amount
	TOTAL	\$830.13⁷

Respondent's Exhibit 149; Tr. at 73.

*Expenditures with purpose or category described as
"Campaign gas/food/parking/incidentals"*

32. Petitioners made expenditures of greater than \$100 each without reporting a single purpose for each expenditure, but rather reported them in the aggregate with the combined purpose or category of "Campaign Gas/Food/Parking/Incidentals":

Expenditures greater than \$100 reported as "Campaign gas/food/parking/incidentals"			
Date	Payee	Amount	Reported
6/12/2008	Cash	\$120.00	Amended July 2008 Quarterly <i>Exhibit 15A at 15</i>
6/23/2008	Cash	\$150.00	Amended July 2008 Quarterly <i>Exhibit 15A at 15</i>
7/3/2008	Cash	\$120.00	Amended 8 Day Primary 8/5/08 <i>Exhibit 16A at 13</i>
7/9/2008	Damon Jones	\$200.00	Amended 8 Day Primary 8/5/08 <i>Exhibit 16A at 13</i>
7/21/2008	Cash	\$200.00	Amended 8 Day Primary 8/5/08 <i>Exhibit 16A at 13</i>
8/5/2008 ⁸	Cash	\$300.00	Amended 30 Day Primary 8/5/08 <i>Exhibit 17A at 14</i>
9/25/2008	Cash	\$125.00	Amended October 2008 Quarterly <i>Exhibit 18A at 11</i>
6/25/2009	Cash	\$250.00	Amended July 2009 Quarterly <i>Exhibit 23A at 12</i>
7/10/2009	Cash	\$200.00	Amended October 2009 Quarterly <i>Exhibit 24A at 14</i>
7/10/2009	Cash	\$150.00	Amended October 2009 Quarterly <i>Exhibit 24A at 14</i>
1/11/2010	Cash	\$120.00	Amended April 2010 Quarterly <i>Exhibit 26A at 8</i>
11/11/2010	Cash	\$200.00	Amended April 2011 Quarterly <i>Exhibit 26AA at 22</i>
12/5/2010	Cash	\$360.00	Amended April 2011 Quarterly <i>Exhibit 26AA at 22</i>
12/13/2010	Cash	\$200.00	Amended April 2011 Quarterly <i>Exhibit 26AA at 22</i>
	Total	\$2,695.00	

Respondent's Exhibit 153; Tr. at 91.

33. Petitioners made the following expenditures of \$100 or less, and did not report a single purpose for each expenditure, but reported them with the combined purpose or category of "Campaign Gas/Food/Parking/Incidentals":

⁷ Our total here, as in certain other tables, differs from the MEC's corresponding table included in its written argument. We derive our information from the exhibit cited, here Respondent's Exhibit 149.

⁸ This expenditure was under the category "Election Day Food/Gas/Incidentals."

Reported Purpose:	Amount	Report
Campaign Gas/Food/Parking/Incidentals	\$617.02	Amended July 2008 Quarterly <i>Exhibit 15A at 13</i>
Campaign Gas/Food/Parking/Incidentals	\$100.00	Amended 8 Days Before Primary 2008 <i>Exhibit 16A at 12</i>
Campaign Gas/Food/Parking/Incidentals	\$736.55	Amended 30 Day After Primary 2008 <i>Exhibit 17A at 10</i>
Campaign Gas/Food/Parking/Incidentals	\$287.63	Amended October 2008 quarterly <i>Exhibit 18A at 10</i>
Campaign Gas/Food/Parking/Incidentals	\$600.96	Amended 8 Days Before General 2008 <i>Exhibit 19A at 12</i>
Campaign Gas/Food/Parking/Incidentals	\$686.45	Amended 30 Days After General 2008 <i>Exhibit 20 at 9</i>
Campaign Gas/Food/Parking/Incidentals	\$537.43	Amended January Quarterly 2009 <i>Exhibit 21A at 6</i>
Campaign Gas/Food/Parking/Incidentals	\$894.10	Amended April Quarterly 2009 <i>Exhibit 22A at 8</i>
Campaign Gas/Food/Parking/Incidentals	\$1,542.16	Amended July Quarterly 2009 <i>Exhibit 23A at 11</i>
Campaign Gas/Food/Parking/Incidentals	\$1,744.05	Amended October Quarterly 2009 <i>Exhibit 24A at 12</i>
Campaign Gas/Food/Parking/Incidentals	\$1,909.99	Amended January Quarterly 2010 <i>Exhibit 25A at 10</i>
Campaign Gas/Food/Parking/Incidentals	\$943.14	Amended April Quarterly 2010 <i>Exhibit 26A at 7</i>
Campaign Gas/Food/Parking/Incidentals	\$810.89	Amended July Quarterly 2010 <i>Exhibit 27A at 6</i>
Campaign Gas/Food/Parking/Incidentals	\$1,912.19	Amended April Quarterly 2011 <i>Exhibit 26AA at 20</i>
Gas/Food/Parking/Incidentals	\$520.89	Amended July Quarterly 2011 <i>Exhibit 31A at 9</i>
Campaign Gas/Food/Parking/Incidentals	\$983.51	October Quarterly 2011 <i>Exhibit 32 at 8</i>
Total	\$14,826.96	

Respondent's Exhibit 152, Tr. at 81-82.

Inaccurate aggregate of expenditures \$100 or less

34. Petitioners inaccurately reported the aggregate of expenditures of \$100 or less by category:

Aggregate of expenditures \$100 or less reported inaccurately			
Report	Reported aggregate expenditures of \$100 or less	Actual aggregate expenditures of \$100 or less from official depository account	Difference
Amended July 2008 quarterly	\$1,284.03	\$770.43	\$513.60
Amended 30 Day After Primary 2008	\$885.70	\$1,112.20	-\$226.50
Amended 8 Day Before General 2008	\$939.76	\$1,039.76	-\$100.00
Amended 30 Day After General 2008	\$1,210.56	\$1,950.51	-\$739.95
Amended January 2009 quarterly	\$1,065.00	\$1,165.00	-\$100.00
Amended April 2009 quarterly	\$1,374.45	\$1,447.45	-\$73.00
Amended July 2009 quarterly	\$2,571.64	\$2,393.59	\$178.05
Amended October 2009 quarterly	\$4,008.92	\$4,305.97	-\$297.05
Amended January 2010 quarterly	\$3,469.65	\$3,602.98	-\$133.33
Amended April 2010 quarterly	\$1,562.13	\$1,719.13	-\$157.00
Amended July 2010 quarterly	\$1,494.22	\$1,594.22	-\$100.00
Amended April 2011 quarterly	\$4,223.70	\$4,213.33	\$10.37

Respondent's Exhibit 154; Tr. at 93-94.

Missing address information

35. The MEC's "Expenditures of \$100 or Less by Category" form instructs filers to individually list all payments to campaign workers. *E.g., Respondent's Exhibit 16A at 12.*

36. Likewise, the MEC's "Itemized Expenditures Over \$100 Supplemental Form" instructs filers to individually list all payments to campaign workers. *E.g., Respondent's Exhibit 16A at 13.*

37. Petitioners failed to include the recipient's address for 128 expenditures totaling \$45,558.30 that were either over \$100 or made to campaign workers. *Respondent's Exhibit 155; Tr. at 95.*

Inaccurately reported recipient or amount of expenditures over \$100

38. Petitioners did not accurately report the recipient or amount for several expenditures that were over \$100 each.

39. Petitioners incorrectly reported an expenditure of \$549 to Amtrak, *Respondent's Exhibit 40A at 1*, as an expenditure of \$132.09 to Amtrak, *Respondent's Exhibit 19A at 14*, and incorrectly reported an expenditure of \$132.09 to Hilton Hotels, *Respondent's Exhibit 40A at 2*, as an expenditure of \$549 to Hilton Hotels, *Respondent's Exhibit 19A at 14*.

40. Petitioners incorrectly reported a \$1,000 expenditure to CSI Telecommunications, *Respondent's Exhibit 50A at 11*, as a \$1,000 expenditure to John Bowman, *Respondent's Exhibit 24A at 14*.

41. Petitioners incorrectly reported a \$3,650 expenditure to DaVita Hanson, *Respondent's Exhibit 51A at 33*, as a \$3,650 expenditure to Michael Tarrell, *Respondent's Exhibit 24A at 13*.

42. Petitioners incorrectly reported a \$1,977 expenditure to John Bowman, *Respondent's Exhibit 51A at 29*, as a \$1,977 expenditure to Michael Tarrell, *Respondent's Exhibit 24A at 15*.

43. Petitioners incorrectly reported a \$445 expenditure to Colonial West Apartments, *Respondent's Exhibit 65A at 4*, as an expenditure of \$445 to Robin Wright-Jones, *Respondent's Exhibit 26AA at 22*.

Count V—Cash expenditures in excess of limits

44. Petitioners made the following 23 cash expenditures of over \$50, totaling \$6,403.90:

Description	Date	Amount	Exhibit
Cash	6/12/2008	\$120.00	<i>Exhibit 36A at 17 (\$120 withheld from deposit)</i>
Cash	7/3/2008	\$120.00	<i>Exhibit 37 at 16 (Bates page 51)</i>
Cash	7/15/2008	\$100.00	<i>Exhibit 37 at 15 (Bates page 50)</i>
Cash	7/21/2008	\$200.00	<i>Exhibit 37 at 21 (Bates page 56)</i>
Cash	7/30/2008	\$200.00	<i>Exhibit 38A at 21</i>
Cash	8/2/2008	\$350.00	<i>Exhibit 38A at 22</i>
Cash	8/4/2008	\$750.00	<i>Exhibit 38A at 4</i>
Cash	8/5/2008	\$1,800.00	<i>Exhibit 38A at 25</i>

Description	Date	Amount	Exhibit
Cash	8/16/2008	\$100.00	<i>Exhibit 38A at 19</i>
Cash	8/22/2008	\$600.00	<i>Exhibit 38A at 3</i>
Cash	9/25/2008	\$125.00	<i>Exhibit 39A at 15 (Bates page 42)</i>
Cash	10/22/2008	\$100.00	<i>Exhibit 40 at 46 (\$100 withheld from deposit)</i>
Cash	5/20/2009	\$100.00	<i>Exhibit 47 at 11 (Bates page 27) (\$100 withheld from deposit)</i>
Cash	6/16/2009	\$100.00	<i>Exhibit 48 at 10 (Bates page 48) (\$100 withheld from deposit)</i>
Cash	6/25/2009	\$250.00	<i>Exhibit 48 at 15 (Bates page 53) (\$250 withheld from deposit)</i>
Cash	9/10/2009	\$150.00	<i>Exhibit 51 at 11 (\$150 withheld from deposit)</i>
ATM Cash	6/6/2009	\$102.00	<i>Exhibit 48 at 1 (Bates page 39)</i>
ATM Cash	6/21/2009	\$102.00	<i>Exhibit 48 at 1 (Bates page 40)</i>
ATM Cash	7/10/2009	\$202.95	<i>Exhibit 49 at 1</i>
ATM Cash	7/12/2009	\$62.95	<i>Exhibit 49 at 1</i>
ATM Cash	11/11/2010	\$203.00	<i>Exhibit 65A at 1</i>
ATM Cash	12/5/2010	\$363.00	<i>Exhibit 66A at 1 (Bates page 8)</i>
ATM Cash	12/13/2010	\$203.00	<i>Exhibit 66A at 1 (Bates page 8)</i>
	TOTAL	\$6,403.90	

Respondent's Exhibit 151, Tr. 112-113.

45. The MEC identified another five cash expenditures over \$50 that were used to purchase cashier's checks for campaign related expenses and transactions reported on amended disclosure reports. Out of the five cash transactions totaling \$7,374.44, all but \$250 was identified as having been paid to Creative Litho, Inkosi, Mueller Signs, the MEC, or transferred from the first official depository account to the second by cashier's check. *Tr. 131-134.*

Count VI—Expenditures to individuals reported as “consulting services”
with no independent contractor supplemental report

46. For \$44,295.13 in expenditures, Petitioners reported purposes such as “campaign professional services” and “campaign activity,” and did not file an independent contractor form for the expenditures. The table of such expenditures is contained in Appendix C.

47. The memo line of some checks written and signed by Petitioners reflected a purpose more descriptive and specific than “Campaign Professional Service” or “Campaign Activity.” For example, a \$350 check written to Phillip Berry, reported as “Campaign

Activity,” *Respondent’s Exhibit 26A at 8*, had a memo line “DJ for party,” *Respondent’s Exhibit 56A at [Bates p. 23]*.

Count VII—Expenditures for Clothing and Food

48. Petitioners reported campaign clothing purchases that occurred after the November 2008 general election, and well before the August 2012 primary. For example, Petitioners reported a \$1,664.33 expenditure on August 13, 2009, to Distinctions with the purpose “Campaign Clothing.” *Respondent’s Exhibit 24A at 14*. When Wright-Jones was asked about the specifics of this expenditure at the hearing, she declined to answer on the basis of her rights under the Fifth Amendment to the U.S. Constitution, on the advice of her counsel.

49. For expenditures over \$100, Petitioners identified the following purchases as “Campaign Clothing” on disclosure reports:

Date	Recipient	Amount	Report
7/6/2009	Sunglass Hut	\$141.09	Amended October 2009 quarterly <i>Exhibit 24A at 14</i>
8/13/09	Distinctions	\$1,664.33	
9/16/09	Distinctions	\$125.00	
10/7/09	Marmi	\$306.07	Amended January 2010 quarterly <i>Exhibit 25A at 12</i>
10/10/09	Dillards	\$191.93	
10/10/09	Dillards	\$277.11	
10/24/09	Chico’s	\$114.65	Amended April 2011 quarterly <i>Exhibit 26AA at 22</i>
10/25/10	Marmi ⁹	\$111.43	
	TOTAL	\$2,931.61	

50. Petitioners’ expenditures at grocery stores and restaurants between August 14, 2008 and November 22, 2010, exceeded \$5,000. Appendix C.

⁹ This appears to be the same purchase originally identified as “Non Campaign” on Petitioners’ original April 2011 quarterly report. *Exhibit 30 at 9* (both purchases reported on 10/25/2010 from Marmi for \$111.43).

Count VIII—Unauthorized Use

Travel expenses and mileage reimbursements – out of session

51. Petitioners used campaign contributions for more than \$1,200 in expenditures at gas stations. The State of Missouri compensated Wright-Jones in personal mileage reimbursements for that same travel.

52. For example, on July 26, 2011, Wright-Jones sought mileage reimbursement for travel from St. Louis to Jefferson City and back. *Respondent's Exhibit 135*. She received that payment personally from the State of Missouri. *Respondent's Exhibit 85*. However, Petitioners used campaign contributions to make a purchase that same day at the Fastlane gas station in Holts Summit (a few miles north of Jefferson City). *Respondent's Exhibit 75*. Wright-Jones never reimbursed her candidate committee account for that expenditure. *Respondent's Exhibits 75–81*.

53. Wright-Jones made similar purchases and received similar reimbursements as set forth below:

Committee Account		Reimbursement from State of Missouri to Petitioner Wright-Jones
Date and location	Amount	
May 20, 2009 at Exxon Mobil in St. Louis. May 23, 2009 at BP in St. Louis. <i>Exhibit 47A at 1.</i>	\$104.85	May 21, 2009: St. Louis to Jefferson City and return. <i>Exhibit 90</i> .
July 9, 2009 at Bel Ridge. July 10, 2009 at Normandy. July 12, 2009 at BP in Blue Springs. <i>Exhibit 49A at 1–2.</i>	\$74.16	July 9–12, 2009: St. Louis to Columbia to Kansas City and return. <i>Exhibit 92</i> .
August 21, 2009 at BP in St. Louis. August 22, 2009 at Exxon Mobil in Kingdom City. <i>Exhibit 50A at 1–2.</i>	\$82.12	August 22, 2009: St. Louis to Jefferson City and return. <i>Exhibit 93</i> .
September 29, 2009 at QT in Hazelwood. <i>Exhibit 51A at 3.</i>	\$38.35	September 29, 2009: St. Louis to Kansas City and return. <i>Exhibit 94</i> .

Committee Account		Reimbursement from State of Missouri to Petitioner Wright-Jones
Date and location	Amount	
October 1, 2009 at Break Time in Columbia. October 2, 2009 at Ozark Oil in Doolittle. October 4, 2009 at Exxon Mobil in St. Louis. <i>Exhibit 52A.</i>	\$105.77	October 2, 2009: St. Louis to Branson and return. <i>Exhibit 94.</i>
November 5, 2009 at QT in St. Peters. <i>Exhibit 53.</i>	\$22.27	November 5, 2009: St. Louis to Jefferson City and return. <i>Exhibit 97.</i>
November 28, 2009 at Holts Summit 10. November 30, 2009 at Convenient Food in Jefferson City. <i>Exhibit 53 at 2.</i>	\$100.68	November 27–28, 2009: St. Louis to Jefferson City and return; November 29: St. Louis to Jefferson City and return <i>Exhibit 99.</i>
December 5, 2009 at QT in St. Peters. December 7, 2009 at Exxon Mobil in Kingdom City. <i>Exhibit 54A.</i>	\$61.24	December 5, 2009: St. Louis to Jefferson City and return. <i>Exhibit 99.</i>
December 13, 2009 at BP in St. Louis. <i>Exhibit 54A.</i>	\$50.56	December 13, 2009: St. Louis to Jefferson City. <i>Exhibit 100.</i>
December 15, 2009 at Convenient Food in Jefferson City. <i>Exhibit 54A.</i>	\$31.62	December 15, 2009: Jefferson City to St. Louis. <i>Exhibit 100.</i>
August 24, 2010 at Exxon Mobil in St. Louis. <i>Exhibit 62A.</i>	\$35.00	August 25, 2010: St. Louis to Jefferson City and return. <i>Exhibit 120.</i>
November 3, 2010 at Exxon Mobil in St. Louis (2 transactions). <i>Exhibit 65A.</i>	\$56.59	November 4, 2010: St. Louis to Jefferson City. <i>Exhibit 125.</i>
November 6, 2010 at Westland Travel in Kingdom City. <i>Exhibit 65A.</i>	\$46.73	November 5, 2010: Jefferson City to St. Louis. <i>Exhibit 125.</i>
November 19, 2010 at Westland Travel in Kingdom City. <i>Exhibit 65A.</i>	\$29.43	November 18, 2010: St. Louis to Jefferson City. <i>Exhibit 127.</i>
December 1, 2010 at Westland Travel in St. Louis. <i>Exhibit 66A.</i>	\$48.23	December 1, 2010: Jefferson City to St. Louis. <i>Exhibit 128.</i>
December 4, 2010 at BP in St. Louis. <i>Exhibit 66A.</i>	\$55.86	December 5, 2010: St. Louis to Jefferson City. <i>Exhibit 129.</i>
December 8, 2010 at Westland Travel in Kingdom City. <i>Exhibit 66A.</i>	\$46.12	December 7, 2010: Jefferson City to St. Louis. <i>Exhibit 129.</i>
December 29, 2010 at Westland Travel in Kingdom City. <i>Exhibit 66A at 2.</i>	\$40.76	December 28, 2010: St. Louis to Jefferson City and return. <i>Exhibit 130.</i>
July 11, 2011 at Fastlane in Holts Summit. <i>Exhibit 75.</i>	\$29.73	July 11, 2011: St. Louis to Jefferson City and return. <i>Exhibit 134.</i>
July 14, 2011 at Fastlane in Holts Summit. <i>Exhibit 75.</i>	\$31.36	July 14, 2011: St. Louis to Jefferson City and return. <i>Exhibit 134.</i>
July 26, 2011 at Fastlane in Holts Summit. <i>Exhibit 75.</i>	\$54.75	July 26, 2011: St. Louis to Jefferson City and return. <i>Exhibit 135.</i>

Committee Account		Reimbursement from State of Missouri to Petitioner Wright-Jones
Date and location	Amount	
August 15, 2011 at Fastlane in Holts Summit. <i>Exhibit 76.</i>	\$66.97	August 14, 2011: St. Louis to Jefferson City and return. <i>Exhibit 136.</i>
October 3, 2011 at Fastlane in Holts Summit. <i>Exhibit 78.</i>	\$44.28	October 2, 2011: St. Louis to Jefferson City and return. <i>Exhibit 138.</i>
TOTAL	\$1,257.43	

Travel expenses and mileage reimbursements – in session

54. Wright-Jones made similar purchases and received similar reimbursements relating to expenses she incurred in traveling between her Senate District and Jefferson City for legislative sessions. *E.g., Respondent’s Exhibit 83 (second to last column shows \$128.25 per week).* Committee records showed Wright-Jones often used campaign contributions to purchase gasoline in St. Louis before the start of these weekly sessions and to purchase gasoline near Jefferson City at the end of the week for the return trip.

55. For example, on Monday, January 26, 2009, Wright-Jones spent \$26 at QT in St. Peters, Missouri. *Respondent’s Exhibit 43A.* On Saturday, January 31, 2009, Wright-Jones spent \$19.93 at Exxon Mobil in Kingdom City, Missouri. *Id.* However, Wright-Jones was personally reimbursed \$128.25 for attending the Missouri Senate session the “week of 1/26–1/29.” *Respondent’s Exhibit 83.* Wright-Jones never reimbursed her candidate committee account for that expenditure.

56. Similar purchases and reimbursements were made as follows:

Committee Account		Related Reimbursement from State of Missouri to Petitioner Wright-Jones
Date and location	Amount	
Monday, January 26, 2009 at QT in St. Peters. Saturday, January 31, 2009 at Exxon Mobil in Kingdom City. <i>Exhibit 43A.</i>	\$26.00	Week of 1/26–1/29. <i>Exhibit 83.</i>
Monday, March 2, 2009 at Hucks in St. Peters. <i>Exhibit 45.</i>	\$30.39	Week of 3/2–2/5. <i>Exhibit 83 at 2.</i>
Wednesday, March 11, 2009 at Convenient Food in Jefferson City. <i>Exhibit 45.</i>	\$38.06	Week of 3/9–3/12. <i>Exhibit 83 at 2.</i>

Committee Account		Related Reimbursement from State of Missouri to Petitioner Wright-Jones
Date and location	Amount	
Monday, April 6, 2009 at Convenient Food in Jefferson City. <i>Exhibit 46A.</i>	\$39.92	Week of 4/6–4/9. <i>Exhibit 83 at 2.</i>
Monday, April 13, 2009 at BP in Bridgeton. Saturday, April 18, 2009 at Exxon Mobil in Kingdom City. <i>Exhibit 46A.</i>	\$38.42	Week of 4/14–4/16. <i>Exhibit 83 at 2.</i>
Monday, April 20, 2009 at Shell in Kingdom City. <i>Exhibit 46A.</i>	\$35.01	Week of 4/20–4/23. <i>Exhibit 83 at 2.</i>
Sunday, May 3, 2009 at BP in St. Louis. Saturday, May 9, 2009 at Exxon Mobil in Jefferson City. <i>Exhibit 47A.</i>	\$68.99	Week of 5/4–5/7. <i>Exhibit 83 at 2.</i>
Wednesday, September 16, 2009 at Exxon Mobil in Kingdom City. <i>Exhibit 51A.</i>	\$44.45	Veto session week of 9/16. <i>Exhibit 83 at 4.</i>
Thursday, January 7, 2010 at Mr. Convenience in Jefferson City. <i>Exhibit 55A</i>	\$49.60	Week of 1/6/10. <i>Exhibit 84.</i>
Monday, January 11, 2010 at BP in Jefferson City. <i>Exhibit 55A.</i>	\$50.49	Week of 1/11–1/14. <i>Exhibit 84.</i>
Thursday, January 21, 2010 at BP in St. Louis. <i>Exhibit 55A.</i>	\$53.18	Week of 1/19–1/21. <i>Exhibit 84.</i>
Friday, January 29, 2010 at Holts Summit 10. <i>Exhibit 55A at 2.</i>	\$45.70	Week of 1/25–1/28. <i>Exhibit 84.</i>
Tuesday, February 2, 2010 at BP in St. Louis. <i>Exhibit 56A.</i>	\$45.34	Week of 2/1–2/4. <i>Exhibit 84.</i>
Sunday, February 7, 2010 at QT in St. Peters. <i>Exhibit 56A.</i>	\$35.12	Week of 2/6–2/11. <i>Exhibit 84.</i>
Thursday, February 18, 2010 at Exxon Mobil in Kingdom City. <i>Exhibit 56A.</i>	\$37.68	Week of 2/15–2/18. <i>Exhibit 84.</i>
Friday, April 9, 2010 at QT in St. Louis. <i>Exhibit 58A.</i>	\$54.21	Week of 4/6–4/8. <i>Exhibit 84 at 2.</i>
Thursday, April 15, 2010 at Convenient Food in Jefferson City. <i>Exhibit 58A.</i>	\$50.82	Week of 4/12–4/15. <i>Exhibit 84 at 2.</i>
Thursday, September 8, 2011 at Fastlane in Holts Summit. <i>Exhibit 77.</i>	\$36.45	Week of 9/6–9/9. <i>Exhibit 85 at 3.</i>
Friday, January 6, 2012 at Exxon Mobil in Kingdom City. <i>Exhibit 81.</i>	\$36.74	Week of 1/4–1/5. <i>Exhibit 86.</i>
TOTAL	\$816.57	

Phone reimbursements

57. On October 29, 2009, Wright-Jones submitted a state monthly expense report for reimbursement of \$43.10 for “AT & T Ph Bill Current Charges,” attaching an invoice showing the \$43.10 in current charges and grand total of \$147.64 due in total by October 1, 2009.

Respondent’s Exhibit 96. However, a payment of \$147.64 to AT & T was made from the campaign’s depository account on September 18, 2009. *Respondent’s Exhibit 51A at [Bates p. 21].*

58. On the same expense report, Wright-Jones sought reimbursement of \$219.78 for “AT & T Ph Bill Current Charges” on a different account, attaching an invoice showing the \$219.78 in current charges and a grand total of \$449 total due by October 1, 2009. *Respondent’s Exhibit 96.* However, a payment of \$449.20 to AT & T was made from the campaign’s depository account on September 18, 2009. *Respondent’s Exhibit 51A at [Bates p. 21].*

Conclusions of Law

We have jurisdiction of this matter. § 105.961.3.

Section 105.961.3 is silent regarding the burden of proof. As a general proposition of administrative law, the party seeking a change is “the ‘moving party’ or the party having the affirmative of the issue,” and so bears the burden of proof. *Tonkin v. Jackson Co. Merit System Comm’n*, 599 S.W.2d 25, 31 (Mo. App. W.D. 1980). Here, the MEC seeks a change, that is, to take action against Petitioners under the State’s campaign finance disclosure laws. Therefore, we conclude the MEC bears the burden of proof.

Generally, in administrative proceedings the preponderance of the evidence standard applies. *See Kerwin v. Mo. Dental Bd.*, 375 S.W.3d 219, 230 (Mo. App. W.D. 2012) (applying preponderance standard in case concerning discipline of dental license, where Dental Board

bears burden). Accordingly, the MEC must bear its burden herein by a preponderance of the evidence.

We follow the same law that the MEC must follow and render, on the evidence heard, the agency's final decision.¹⁰ *See Mo. Ethics Comm'n v. Wilson*, 957 S.W.2d 794, 798-99 (Mo. App. W.D. 1997); *Impey v. Mo. Ethics Comm'n*, 2014 WL 2866487, *4 (Mo. banc., June 24, 2014) (slip op.). If the MEC finds violations but determines, as it has in this case, that "some action other than referral for criminal prosecution or for action by the appropriate disciplinary authority would be appropriate,"¹¹ it shall take any one or more of the following actions:

- (1) Notify the person to cease and desist violation of any provision of law which the report concludes was violated and that the commission may seek judicial enforcement of its decision pursuant to subsection 5 of this section;
- (2) Notify the person of the requirement to file, amend or correct any report, statement, or other document or information required by sections 105.473, 105.483 to 105.492, or chapter 130 and that the commission may seek judicial enforcement of its decision pursuant to subsection 5 of this section; and
- (3) File the report with the executive director to be maintained as a public document; or
- (4) Issue a letter of concern or letter of reprimand to the person, which would be maintained as a public document; or
- (5) Issue a letter that no further action shall be taken, which would be maintained as a public document; or
- (6) Through reconciliation agreements or civil action, the power to seek fees for violations in an amount not greater than one

¹⁰ The MEC's duty under § 105.961.3 is to determine whether "probable cause exists that a violation has occurred." We note that under certain circumstances, the MEC may refer cases for criminal prosecution. That is not one of the actions available to this Commission under § 105.961.4. Therefore, consistent with our prior decisions, we have determined whether the violation occurred, rather than whether there is probable cause that it occurred. This is consistent with the holding in *Impey v. Mo. Ethics Comm'n*, 2014 WL 2866487, *4 (Mo. banc., June 24, 2014) (slip op.) (the MEC's decision is tentative and does not become final until after AHC review).

¹¹ In the case of a member of the General Assembly, the appropriate disciplinary authority includes the "ethics committee of the house of which the subject of the report is a member." § 105.961.7(1). Petitioner Wright-Jones lost her bid for re-election in the August 2012 primary and is no longer a member of the General Assembly.

thousand dollars or double the amount involved in the violation.

§ 105.961.4.

*Overview of Missouri's
campaign-finance disclosure law*

Under Missouri law, a candidate committee treasurer must file a statement of organization with the “appropriate officer.” § 130.021.5. For candidates for election to the Missouri Senate, the appropriate officers with whom statements and reports must be filed are the MEC and the election authority for the candidate’s place of residence. § 130.026.2(2). The candidate must appoint a treasurer, and the treasurer may be the candidate or someone else, but the “candidate committee is ultimately responsible for all reporting requirements pursuant to” Chapter 130. § 130.021.2, § 130.058.¹²

A candidate committee must open an official depository account at an appropriate institution, such as a federally- or state-chartered bank or credit union, and disclose that account to the appropriate officer. § 130.021.4(1). All contributions made to the committee and all expenditures made by the committee must be deposited into and expended from that account. § 130.021.4. Changes to the official depository account must be disclosed on an amended statement of committee organization filed within 20 days of the change. § 130.021.7.

Missouri law strictly limits cash and other anonymous contributions, and cash expenditures. § 130.031.

The law limits the uses to which contributions can be put. “Contributions... shall not be converted to any personal use.” § 130.034.¹³ “Contributions may be used for any purpose allowed by law including, but not limited to...[a]ny ordinary and necessary expenses incurred in connection with the duties of a holder of elective office[.]” § 130.034.2(2).

¹² RSMo 2000.

¹³ RSMo 2000.

The law establishes reporting requirements. All committee contributions received and expenditures made must be reported on regular campaign disclosure reports. § 130.041.1. These reports must be filed according to the following schedule: each calendar quarter, 8 days before the candidate's election date, and 30 days after the candidate's election date, in addition to other times. § 130.046.

Additionally, candidates must report the specific purpose for most expenditures made by the committee. For example, expenditures to campaign workers must identify the worker by name, address, and occupation. § 130.041.1(4)(d). Under § 130.041.4, candidates may not use “[t]he words ‘consulting or consulting services, fees, or expenses’ or similar words...to describe the purpose of a payment as required in this section.”

In their complaint to the MEC, their written argument, and at other times throughout the record, Petitioners have objected to various provisions of the campaign finance disclosure law and to the procedures and remedies detailed therein on constitutional grounds. They argue that fees imposed by the MEC under the law constitute illegal, excessive punishment by an administrative agency, which the Missouri Constitution prohibits. And they argue that the restrictions upon campaign expenditures in Missouri's campaign finance disclosure law impose unconstitutional restrictions upon the First Amendment rights of the Petitioners to speak through expenditure of funds on a political campaign by virtue of *Citizens United v. Federal Election Comm.*, 558 U.S. 310 (2010). This Commission does not have authority to decide constitutional issues. *Sprint Communications Co., L.P. v. Director of Revenue*, 64 S.W.3d 832, 834 (Mo. banc 2002); *Cocktail Fortune, Inc. v. Supervisor of Liquor Control*, 994 S.W.2d 955, 957 (Mo. banc 1999); *Williams Cos. v. Director of Revenue*, 799 S.W.2d 602, 604 (Mo. banc, 1990); *Fayne v. Dept. of Soc. Serv's*, 802 S.W.2d 565 (Mo. App., W.D. 1991). We have no authority to declare a statute unconstitutional. *State Tax Comm'n v. Admin. Hearing Comm'n*, 641 S.W.2d 69 (Mo.

banc 1982). We merely note here that Petitioners have raised these issues and may argue them before the courts if necessary. *Tadrus v. Missouri Bd. of Pharmacy*, 849 S.W.2d 222 (Mo. App., W.D. 1993).

We next address, by count, the alleged violations of law. As we proceed and for simplicity, we will identify under each count any fee we impose or other action we take under § 105.961.4.

Count I—Failure to timely amend
statement of committee organization

Candidates must open and maintain a single official depository account at an appropriate institution, and use that account for contributions and expenditures. § 130.021.4. The candidate must disclose information about this account, including the name and account number of each depository account, on a statement of committee organization filed with the appropriate filing officer. § 130.021.5(6). A change to the official depository account information required in § 130.021.5(6) is listed as a change prompting the filing or an amended statement of committee organization and must be filed within 20 days pursuant to § 130.021.7.¹⁴

The MEC demonstrated, by a preponderance of the evidence, that Petitioners violated § 130.021.7 in that no amended statement of committee organization was filed with the MEC within 20 days of February 10, 2011, when Petitioners opened a new official depository account. Neither was an amended statement filed within 20 days of closing the original account on April 8, 2011. In fact, the MEC's evidence demonstrated that Petitioners filed an amended statement of organization on July 14, 2011, five months after opening the new account and three months after transferring all funds to the new account but did not disclose updated information so as to notify the MEC of the existence of the new account and closure of the old one.

We order that Petitioners be reprimanded for this violation pursuant to § 105.961.4(4).

¹⁴ The MEC's May 2013 order concludes that Petitioners violated § 130.021.6, but because the language in which the violation is described in the MEC's conclusions of law clearly refers to § 130.021.7, we find Petitioners had adequate notice of the alleged violation.

Count II—Failure to timely file disclosure reports;
Incorrect reporting periods; and incorrect reporting of cash on hand

Failure to timely file disclosure reports

Petitioners were required to file disclosure reports no later than the following deadlines:

- 8 days before each election in which Ms. Wright-Jones was a candidate. § 130.046.1(1);
- 30 days after each election in which Wright-Jones was a candidate, § 130.046.1(2); and
- on the 15th day following the close of each calendar quarter. § 130.046.1(3).

The MEC demonstrated, by a preponderance of the evidence, that Petitioners violated § 130.046.1 by repeatedly failing to file their disclosure reports on time. They entirely failed to file a quarterly report for the third quarter of 2010, which was due to the MEC no later than October 15 of that year.¹⁵ These failures meant that interested persons were not timely apprised of Wright-Jones' campaign contribution receipts and expenditure activity.

For these violations, we order Petitioners to prepare and file the quarterly report that was due October 15, 2010 pursuant to § 105.961.4(2). We also impose a fee. Pursuant to §105.963.1, the MEC must assess a late fee to the Committee of \$10 per day for each day the report remains unfiled after it is due, and upon notice to the Committee, a fee of \$100 per day may be assessed for every day beyond 30 days it remains overdue. The statutory maximum is \$3,000 per report. The MEC asks us to impose a single fee of \$1,000 for this violation, rather than cumulative daily fees for each late-filed disclosure. Although we are charged with the exercise of the same discretion afforded the MEC, we do not have the benefit of the agency's

¹⁵ We note that the MEC presented evidence (Exhibit 26AA) that the Committee filed an amended quarterly report for April 2011 that purported to report activity from July 1, 2010 to March 31, 2011, but the proper period of coverage for that report was January 1, 2011 to March 31, 2011. Supplementing its filings with quarterly reports of October 2010 and January 2011, including only the information regarding transactions between the proper start and end dates for those two reporting periods, is the only proper way the Committee can correct the accounting.

institutional memory of how it has exercised that discretion over the years in other cases. We therefore adopt the MEC's proposed remedial action and impose a fee of \$1,000 pursuant to § 105.961.4(6) for these violations.

Incorrect reporting periods and incorrect cash on hand

The reporting period for an "8 day before" report closes on the twelfth day before the election. § 130.046.1(1). The closing of the "8 day before" report for the November 4, 2008 general election was October 23, 2008. Campaign finance disclosure reports must include the total amount of money possessed by the candidate committee, including amounts in the depository account and cash on hand, at the beginning of the reporting period. § 130.041.1(2). The reports must also account for sums held as of the closing date of the reporting period. § 130.041.1(5). The law requires that the reports are to be cumulative in nature so that the total receipts and disbursements of the committee are reported for the entire election campaign. § 130.046.4.

The MEC demonstrated, by a preponderance of the evidence, that Petitioners did not adhere to the requirements of §§ 130.046.1 and 130.041.1 because the 8-day-before report for the November 2008 general election improperly excluded the day of October 23, 2008.¹⁶ Furthermore, the reports that were submitted were not cumulative in that money on hand did not balance from report to report. On the April 2010 quarterly report, Petitioners reported an ending balance of \$95,847.69. The next report submitted, the quarterly report for April 2011, showed a beginning balance of \$211.74. Between April 2010 and April 2011, the total amount of money reported to be on hand decreased by a net amount \$95,635.95, but Petitioners did not disclose to the MEC expenditures sufficient to account for the use of that money.¹⁷

¹⁶ The Committee's amended report failed to correct the omission of this date.

¹⁷ As noted in FN 13, MEC Exhibit 26AA was supposed to be an amended quarterly report for April 2011, but the time period covered is from July 1, 2010 to March 31, 2011. The total money on hand, according to this report (ostensibly as of 7/1/2010), was still reported as \$211.74.

In order to correct this violation, pursuant to § 105.961.4(2), we order that Petitioners amend the quarterly reports from April 2010 and July 2010 and submit quarterly reports for October 2010 and January 2011 to account for the imbalance in the cash and depository funds on hand from report to report during that 12-month period. We also impose a fee of \$1,000 pursuant to § 105.961.4(6).

Count III—Contributions

Contributions not timely reported

Under § 130.041.1(3), Petitioners were required to file campaign finance disclosure reports that set forth receipts for the appropriate reporting period, including the:

- (a) Total amount of all monetary contributions received which can be identified in the committee's records by name and address of each contributor. In addition, the candidate committee shall make a reasonable effort to obtain and report the employer, or occupation if self-employed or notation of retirement, of each person from whom the committee received one or more contributions which in the aggregate total in excess of one hundred dollars and shall make a reasonable effort to obtain and report a description of any contractual relationship over five hundred dollars between the contributor and the state if the candidate is seeking election to a state office or between the contributor and any political subdivision of the state if the candidate is seeking election to another political subdivision of the state;
- (b) Total amount of all anonymous contributions accepted;
- (c) Total amount of all monetary contributions received through fund-raising events or activities from participants whose names and addresses were not obtained with such contributions, with an attached statement or copy of the statement describing each fund-raising event as required in subsection 6 of section 130.031;
- (d) Total dollar value of all in-kind contributions received; [and]

- (e) A separate listing by name and address and employer, or occupation if self-employed or notation of retirement, of each person from whom the committee received contributions, in money or any other thing of value, aggregating more than one hundred dollars, together with the date and amount of each such contribution[.]

The MEC demonstrated, by a preponderance of the evidence, that Petitioners violated § 130.041.1(3) by failing to report \$69,092 in campaign contributions by donors who gave over \$100 in the aggregate. The MEC investigators discovered the unreported contributions upon reviewing the record transactions in the first depository account maintained by Petitioners and comparing them to reported contributions in the finance reports submitted to the MEC. Those omitted monetary contributions were deposited between June of 2008 and June of 2010.

Petitioners, through the accounting work of Lisa Meisner under the supervision of Charles Bratkowski, CPA,¹⁸ prepared and filed several amended disclosure reports in August, September, and November of 2011, and April of 2012.¹⁹ We conclude that the candidate and her committee, through April 17, 2012, have amended their disclosures and reported the majority of the contributions omitted from earlier reports, leaving a total of \$4,242.00 in contributions received between September and November 2008 that were not properly disclosed through disclosure report amendments.

The MEC asks that we impose a fee of \$69,092 for this violation, but stay the payment of 90% of that amount provided that Petitioners fulfill certain obligations. Like the MEC, our authority to impose a fee for such a violation is found in § 105.961.4(6), which authorizes “the power to seek fees for violations in an amount not greater than one thousand dollars or double the amount involved in the violation.” We agree that Petitioners’ reporting deficiencies were

¹⁸ Mr. Bratkowski’s name is also spelled as “Brataowski” in the record.

¹⁹ Although Ms. Meisner testified that she prepared amendments as late as the day before hearing, the documents were not offered into evidence. The last amended report in evidence appears at Exhibit 33A and is the amended quarterly disclosure report for October 2011. It is listed as a January quarterly report, but covers 10/1/2011 to 12/31/12, which is the October reporting period.

serious. Against this, we balance the fact that Wright-Jones' campaign treasurer fell ill in 2009, and that Petitioners have made substantial efforts during the last three years to correct and file amended reports. We also take into account, again, that the MEC has considerably more experience than this Commission in determining appropriate corrective actions under § 105.961.4.

Therefore, we adopt the MEC's suggestion regarding the appropriate fee for this violation of § 130.041.1(3). Pursuant to § 105.961.4(6), we impose a fee of \$69,092, \$6,909 (ten percent) of which shall be paid within 90 days of the date of our decision. The remaining \$62,183 shall be stayed provided that Petitioners comply with the other orders set forth herein.²⁰ Additionally, pursuant to § 105.961.4(2), we order that Petitioners amend the appropriate reports to disclose all contributions in the table set forth at Finding of Fact 23.

*Contributions reported but not deposited
into official depository account*

The campaign finance disclosure law requires that "[a]ll contributions which the committee receives in money, checks and other negotiable instruments shall be deposited in a committee's official depository account." § 130.021.4(1). At the hearing, the MEC demonstrated, by a preponderance of the evidence, that Petitioners violated § 130.021.4(1) by receiving \$3,475.00 in contributions greater than \$100, and \$4,545 in contributions of \$100 or less, between July 2008 and December 2009 that were not recorded as deposits in the candidate committee's official depository account.

Pursuant to § 105.961.4(4), we order that Petitioners be reprimanded for this violation.

Inaccurate reporting of contribution over \$100

Campaign finance disclosure reports must report the identity of each person from whom the committee received contributions aggregating more than \$100, together with the date and amount of each such contribution. § 130.041.1(3)(e).

²⁰ As summarized at the end of this decision, we take the same approach to all the monetary fees imposed.

The MEC demonstrated, by a preponderance of the evidence, that Petitioners violated § 130.041.1(3)(e). The amended “8 day before”, November 2008 general election report, shows a failure to accurately report the amount of a contribution, stating it was \$500 when it was actually \$1,000.

For this violation, pursuant to § 105.961.4(2), we order that Petitioners file an amended report to correctly report the contribution described in Finding of Fact 26.

Anonymous contributions

Section 130.110.1(3)²¹ limits anonymous campaign contributions:

No anonymous contribution in excess of twenty-five dollars shall be made by any person, and no anonymous contribution in excess of twenty-five dollars shall be accepted by any candidate or committee. If any anonymous contribution in excess of twenty-five dollars is received, it shall be returned immediately to the contributor, if his or her identity can be ascertained, and if the contributor's identity cannot be ascertained, the candidate, or the committee treasurer shall immediately transmit that portion of the contribution which exceeds twenty-five dollars to the state treasurer and it shall escheat to the state.

In its written argument, the MEC argues that Petitioners violated § 130.110.1(3) by accepting one anonymous contribution of \$650 and another of \$325. We do not consider this argument, however, because Petitioners did not have adequate notice of the allegation that they violated this statute. The MEC’s May 2013 order finds facts relating to these anonymous contributions, but makes no conclusions of law about them, and never cites § 130.110, nor does the MEC’s answer, which provides few specifics beyond incorporating the MEC’s May 2013 order into it by reference. But an answer in a case such as this one serves to provide petitioners with the notice required for due process. *See Ballew v. Ainsworth*, 670 S.W.2d 94, 103 (Mo. App. E.D. 1984). We note too that 1 CSR 15-3.380 requires, where the complaint is for review of a respondent’s action, that the answer must include “[a]llegations of any facts on which the

²¹ RSMo 2000.

respondent bases the [underlying] action, with sufficient specificity to enable the petitioner to address such allegations; ... and any provision of the law that allows the respondent to base the action on such facts.”

Therefore, we find no violation of § 130.110.1(3).

Missing address, employer, or occupation information

Petitioners were required to include in their campaign finance disclosure reports a

separate listing by name and address and employer, or occupation if self-employed or notation of retirement, of each person from whom the committee received contributions, in money or any other thing of value, aggregating more than one hundred dollars, together with the date and amount of each such contribution.

§ 130.041.1(3)(e). But under § 130.041.1(3)(a), they were required only to “make a reasonable effort to obtain and report” the name of the contributor’s employer or occupation.

The MEC’s investigator testified that Petitioners failed to report either the address or occupation for ninety-two contributions totaling \$53,225. The law indicates that candidates must report addresses, but must only make a reasonable effort to obtain and report employers or occupations. There is no evidence that Petitioners failed to make the requisite reasonable effort to obtain and report missing information regarding contributors’ employers or occupations. Therefore, we find violations only as to the 35 contributions for which Petitioners failed to report addresses.

The MEC failed to carry its burden to establish a violation under § 130.041.1(3)(e) for providing reports that lacked occupational information, but we find Petitioners violated the statute for providing reports that lacked contributors’ addresses. For this violation, we impose a fee of \$1,000 pursuant to § 105.961.4(6). Pursuant to § 105.961.4(2), we also order Petitioners to file amended reports with correct address information.

Count IV—Expenditures

Expenditures not timely reported

Petitioners were required to timely file campaign finance disclosure reports setting out expenditures. § 130.041.1(4).

The MEC demonstrated, by a preponderance of the evidence, that Petitioners violated § 130.041.1(4). Petitioners failed to timely report a total of \$146,839.11 in expenditures made from June 2008 to April 2011 on the campaign finance disclosure reports that were originally submitted to the MEC. When the disclosure reports were later amended and filed, the amended reports disclosed most of these unreported expenditures. However, we find that a total of \$830.13 in expenditures made from July 2008 to December 2008 were still omitted and not properly reported to the MEC.

For this violation, pursuant to § 105.961.4(2), we order Petitioners to amend the appropriate reports to accurately disclose the expenditures we have set forth as still unreported. The MEC also asks that we impose a fee equal to the originally unreported expenditures, and stay the payment of 90% of such fee. For the reasons discussed above under Count III, we adopt the MEC's proposal. Pursuant to § 105.961.4(6), within 90 days of the date of this decision, Petitioners shall pay a fee of \$14,683. The remaining \$132,156 shall be stayed provided that Petitioners comply with the other orders contained herein.

Expenditures with the purpose or category “Campaign gas/food/parking/incidentals”

The MEC argues that expenditures described under the heading “campaign gas/food/parking/ incidentals” were not properly reported to the MEC and therefore violated § 130.140.1(4)(d). The MEC's evidence includes two tables of such expenditures, one listing individual expenditures of more than \$100, and one with individual expenditures of \$100 or less. *Resp. Ex. 152 & 153*. As to each, it argues that “While “[e]xpenditures of one hundred dollars or

less may be grouped and listed by categories of expenditure showing the total dollar amount of expenditures in each category,” § 130.041.1(4)(d), “the words ... ‘fees, or expenses,’ or similar words, shall not be used to describe the purpose of a payment.” § 130.041.4.”

But the MEC’s order of May 14, 2013, concludes only that such expenditures violated § 130.041.1(4), and not § 130.041.4. In fact, the discussion and application of § 130.041.4 in the MEC’s Findings of Fact, Conclusion of Law and Order was confined to expenditures for campaign consulting and other campaign professional services that were described in such broad terms on disclosure reports but not supplemented by the filing of independent contractor forms listing the details of precisely what professional services were provided. Not only are we not persuaded that § 130.041.4 applies to straightforward and minor expenses such as gas, food and parking, we find, as previously discussed, that waiting until post-hearing written argument to rely upon that provision did not afford the Petitioners proper notice. Accordingly, we limit our analysis to whether Petitioners’ reporting of expenditures as “gas, food, parking and incidentals” violated § 130.041.1(4).

Section 130.041.1(4)(d) requires expenditure reports to contain

the full name and mailing address of each person to whom an expenditure of money or any other thing of value in the amount of more than one hundred dollars has been made, contracted for or incurred, together with the **date, amount and purpose of each expenditure. Expenditures of one hundred dollars or less may be grouped and listed by categories of expenditure** showing the total dollar amount of expenditures in each category[.]

(Emphasis added). We conclude that Petitioners incorrectly reported the expenditures over \$100 by listing them as campaign gas/food/parking/incidentals, but not those of \$100 or less. The “date, amount, and purpose” of *each* expenditure over \$100 must be reported. Expenditures of less than \$100 may be grouped into categories and reported as such. “Category” is a broad word,

defined as “a class, group, or classification of any kind.” WEBSTER’S THIRD NEW INTERNATIONAL DICTIONARY 352 (unabr. 1986). We recognize that allowing such groupings into large categories such as “campaign gas/food/parking/incidentals” could lead to abuses such as the hiding of expenses, but the statute does not appear to restrict the practice.

We order that Petitioners be reprimanded under § 105.961.4(4) for improperly reporting expenses of more than \$100 under the combined category of “campaign gas/food/parking/incidentals.”

Inaccurate aggregate of expenditures \$100 or less

The MEC demonstrated by a preponderance of the evidence that Petitioners incorrectly reported aggregate expenditures of \$100 or less on several reports made between July 2008 and April 2011, thus violating § 130.041.1(4) and § 130.046.4. For this violation, pursuant to § 105.961.4(2), we order Petitioners to amend their reports to reflect accurate, cumulative expenditures of \$100 or less for the reporting periods specified in FOF 34.

Missing address information

Petitioners were required to include, in their campaign finance disclosure reports, the “full name and mailing address of each person to whom an expenditure of money or any other thing of value in the amount of more than one hundred dollars was been made, contracted for or incurred, together with the date, amount and purpose of each expenditure.” § 130.041.1(4)(d). Expenditures to campaign workers in any amount must be reported with the name, address, date, amount, and purpose of each payment. *Id.*

The MEC demonstrated, by a preponderance of the evidence, that Petitioners violated § 130.041.1(4)(d). They failed to report the addresses of persons to whom 128 expenditures, totaling \$45,558.30, were made. The 128 expenditures were either over \$100 each, or they were made to campaign workers.

For this violation, we order that Petitioners be reprimanded pursuant to § 105.961.4(4), reminding them of the requirement to include the address information for expenditures over \$100 and for any expenditures made to campaign workers. In addition, we impose a fee of \$1,000 pursuant to § 105.961.4(6).

*Inaccurately reported recipient or amount
of expenditures over \$100*

Expenditures over \$100 each must be reported with the full name and mailing address of each person to whom the expenditure is made. § 130.041.1(4)(d). The MEC demonstrated, by a preponderance of the evidence, that Petitioners violated § 130.041.1(4)(d), by inaccurately reporting the recipient or amount of at least six expenditures over \$100 each.

The MEC alleges that these six incidents of inaccurate reporting also violated § 130.031.3, which provides that “[N]o expenditures shall be made or incurred, directly or indirectly, in a fictitious name, in the name of another person, or by or through another person in such a manner as to conceal ... the actual recipient and purpose of the expenditure.” Again, Petitioners lacked notice of the allegation they violated this law. But even if we were to consider this issue, we note that the records of these inaccurate reports include mistakes that appear to be mere transpositions or inadvertent errors. There is no evidence of any intent to conceal required information.

For the violation of § 130.041.1(4)(d), pursuant to § 105.961.4(2), we order Petitioners to amend their reports to accurately reflect recipient identity and the amounts of expenditures over \$100.

Count V—Cash expenditures in excess of limits

The law places restrictions on cash expenditures:

Except for expenditures from a petty cash fund which is established and maintained by withdrawals from the committee’s depository account and with records maintained pursuant to the

record-keeping requirements of section 130.036 to account for expenditures made from petty cash, each expenditure of more than fifty dollars, except an in-kind expenditure, shall be made by check drawn on the committee's depository and signed by the committee treasurer, deputy treasurer or candidate. A single expenditure from a petty cash fund shall not exceed fifty dollars, and the aggregate of all expenditures from a petty cash fund during a calendar year shall not exceed the lesser of five thousand dollars or ten percent of all expenditures made by the committee during that calendar year. A check made payable to "cash" shall not be made except to replenish a petty cash fund.

§ 130.031.2.

The MEC demonstrated, by a preponderance of the evidence, that Petitioners violated § 130.031.2. They made at least 23 cash expenditures over the limit of \$50, totaling \$6,403.90, and they withdrew an additional \$250 in cash when obtaining cashier's checks tendered or transferred in campaign-related transactions documented in amended reports filed with the MEC.

For these violations, we impose a fee of \$6,653.90 pursuant to § 105.961.4(6). Consistent with the MEC's approach, we stay for two years the payment of 90% of that fee, provided that Petitioners pay \$665 within 90 days of the date of this decision.

Count VI—Expenditures to individuals reported as "consulting services"
with no independent contractor supplemental report

Payments to independent contractors cannot be vaguely described using words like "consulting services," "fees," or "expenses." The full text of § 130.041.4 provides:

The words "consulting or consulting services, fees, or expenses," or similar words, shall not be used to describe the purpose of a payment as required in this section. The reporting of any payment to such an independent contractor shall be on a form supplied by the appropriate officer, established by the ethics commission and shall include identification of the specific service or services provided including, but not limited to, public opinion polling, research on issues or opposition background, print or broadcast media production, print or broadcast media purchase, computer programming or data entry, direct mail production, postage, rent, utilities, phone solicitation, or fund raising, and the dollar amount prorated for each service.

The MEC demonstrated, by a preponderance of the evidence, that Wright-Jones and her Committee violated § 130.041.4 by filing eleven separate disclosure reports incorporating the phrases “campaign professional services,” “campaign professional fees,” and “campaign activity” to describe the purpose of \$44,295.13 worth of expenditures. Those descriptions are inadequate under § 130.041.4. Further, for each such expenditure described in generic and unacceptable terms, Petitioners failed to file an independent contractor supplemental form to disclose the specific services that were provided in exchange for the amounts spent.

In determining the appropriate remedial action for these violations, we depart from the MEC’s decision to impose a fee of \$1,000 for each missing disclosure and inadequate disclosure report under this section. Because we view Petitioners’ violations under § 130.041.4 to be the same mistake, repeated eleven times, we impose a single fee of \$1,000 pursuant to § 105.961.4(6). We remind Petitioners that the phrases “campaign professional services,” “campaign professional fees,” and “campaign activity” are legally insufficient and should not be used.

Count VII—Personal use

The MEC alleges that Petitioners violated the provisions of § 130.034,²² which prohibits contributions from being converted to personal use. The relevant portion of § 130.034.2 provides as follows:

Contributions may be used for any purpose allowed by law including, but not limited to:

- (1) Any ordinary expenses incurred relating to a campaign;
- (2) Any ordinary and necessary expenses incurred in connection with the duties of a holder of elective office;
- (3) Any expense associated with the duties of candidacy or of elective office pertaining to the entertaining of or providing social courtesies to constituents, professional associations, or other holders of elective office[.]

²² RSMo 2000.

The MEC provided this Commission with evidence of food and clothing expenditures and simply argued that these were personal, based upon the dates they were made. The MEC honed in, for example, on one of the campaign finance reports' disclosure of a clothing purchase described as "campaign clothing" in the amount of \$1,664.11 at a shop called Distinctions. This purchase was made in August 2009, while Wright-Jones' previous election took place in November 2008, and the next election in which she would be a candidate would not occur until August 2012. When called by the MEC as a witness at the hearing for the purpose of conducting cross-examination on this expenditure, Wright-Jones declined to testify. Two questions related to this single expenditure were the only substantive questions put to her.

The MEC argues that in civil administrative actions, a refusal to answer pertinent questions on Fifth Amendment grounds may, in some circumstances, justify the inference that "if the witness had answered truthfully, the answers would have been unfavorable to" him or her, or "would have corroborated testimony given by the opposing side's witnesses on the subject matter of the questions." *Johnson v. Mo. Bd. of Nursing Administrators*, 130 S.W.3d 619, 630-31 (Mo. App. W.D. 2004) (internal citations omitted). We do not disagree, but we cannot make such a leap in this instance.

In *Johnson*, the court pointed out that the plaintiff agency was required to make a *prima facie* case of a violation in the first instance. *Id.* at 631. Here, we have no direct evidence of any personal use of items bought with campaign contributions. Even the MEC's indirect evidence – the timing of the expenditures – is not especially probative, given that § 130.034.2 allows campaign contributions to be used not only for campaign expenses, but also for ordinary and necessary expenses incurred in connection with the duties of an officeholder or expenses of an officeholder in entertaining or providing social courtesies to constituents, professional associations, or other officeholders. Petitioners' expert witness Charles Bratkowski testified that

a person in Wright-Jones' shoes, in her case an incumbent Missouri Senator, is always campaigning. It was his testimony that campaign activity never stops between elections and that candidates such as Wright-Jones routinely attend meetings and other events in her legislative district between elections for the purpose of staying connected to people there. As a former member of the Missouri House, he credibly testified that he would attend over 20 ward meetings in his district every month and that Wright-Jones' senate district was much larger, meaning there were more wards and therefore more ward meetings to attend for purposes directly relating to campaigning for office. It is entirely possible that Wright-Jones purchased clothing to appear at and support various functions and organizations in her home district, or to entertain constituents between elections, simply because she was an incumbent Senator and intended to run for re-election in the future.

Thus, while we might speculate that Wright-Jones' answer to the question about her purchase at Distinctions would have been unfavorable, it would not affirm direct evidence contained in the records because there was no such direct evidence. Moreover, as the Petitioner's written argument asserts, the inference is permissive and may be overcome by contrary evidence, such as Bratkowski's testimony, presented by the Fifth Amendment claimant. *Id.* Therefore, we do not find a preponderance of the evidence indicating wrongdoing under § 130.034.1.

The MEC also asks us to determine that various food expenditures were made for personal use. The chart in Appendix D details over \$5,000 in expenditures of campaign contributions at grocery stores and restaurants from 2008 through 2010. The amount of these expenditures and the pattern in which they were incurred (2009 expenditures were almost twice those in the 2008 election year) were urged upon us by the MEC as evidence of campaign finance disclosure violations. But for the reasons previously discussed, we find the evidence insufficient to

demonstrate that all or any definite portion of them can be accurately attributed solely to personal use. Moreover, the MEC conceded in its written argument that it cannot determine an exact amount of money it alleges was spent on personal use, and it argues only that patterns of purchases “suggest” personal use.²³

We find the MEC, by simply relying on the inference that expenditures on groceries, restaurant meals, clothing and accessories between elections are impermissible expenditures under § 130.034.2, failed to carry its burden of proof to demonstrate the diversion of campaign contributions to personal use.

Count VIII—Unauthorized Use

Contributions may be used for any purpose allowed by law including, but not limited to, ordinary expenses incurred by a campaign, or ordinary and necessary expenses incurred in connection with the duties of a holder of elective office. § 130.034.2(2). Wright-Jones incurred travel and phone expenses of the type that may certainly be incurred in connection with campaigns or her duties as an office holder. She paid for a number of such expenses from her campaign funds, but she also requested reimbursement for the same or overlapping expenses from the State of Missouri. The MEC claims that an expense is not “incurred” by a campaign if an elected official has already received or will receive personal reimbursement from the State of Missouri for that expense, and it is not “ordinary and necessary” to use campaign contributions for a purchase for which the candidate will receive personal reimbursement from the State.

Because Chapter 130 does not define the term “ordinary and necessary,” we turn to the dictionary to determine the plain meaning of the words. *See E&B Granite, Inc. v. Dir. of Revenue*, 331 S.W.3d 314, 318 (Mo. banc 2011) (Absent a statutory definition, the plain meaning of words used in a statute, as found in the dictionary, is typically relied on). “Ordinary” is

²³ Respondent’s Proposed Findings of Fact, Conclusions of Law and Argument at 65.

defined as “occurring or encountered in the usual course of events: not uncommon or exceptional.” WEBSTER'S THIRD NEW INTERNATIONAL DICTIONARY 1589 (unabr. 1986). The adjective “necessary” is noted to come from the same root word as the noun necessary, which in its plural form as “necessaries” is defined as items such as food, clothing, shelter, etc., that cannot be done without. *Id.* at 1510. “Incurred” is the past tense of incur, which the dictionary defines as “to become liable or subject to.” *Id.* at 1146.

We do not question that expenses for travel and communications are ordinary for a candidate or an office holder, or that Wright-Jones incurred them. The further question is whether, given that they were reimbursed by the Senate, they were “necessary.” We conclude that, because she had another source to pay for these expenses, Wright-Jones’ expenditure of campaign funds for the items below was not “necessary.”

Mileage reimbursements

The MEC demonstrated by a preponderance of the evidence that Petitioners violated § 130.034.2(2) when they used campaign contributions to purchase approximately \$1,257.43 in gasoline for travel expenses. These expenditures were not necessary because Wright-Jones received personal mileage reimbursements from the State of Missouri for the same travel.

For this violation, we impose a fee of \$1,257, pursuant to § 105.961.4(6).

Mileage payments

The MEC demonstrated by a preponderance of the evidence that Petitioners violated § 130.034.2(2) by using campaign contributions to purchase approximately \$816.39 in gasoline for traveling to and from sessions of the Missouri Senate. These expenditures were not necessary because Wright-Jones was paid a weekly mileage allowance for travel to and from sessions of the Missouri Senate.

For this violation, we impose a fee of \$816, pursuant to § 105.961.4(6).

Phone reimbursements

The MEC demonstrated by a preponderance of the evidence that Petitioners violated § 130.034.2(2) by using campaign contributions to pay \$262.88 in phone charges. These expenditures were not necessary because Wright-Jones received reimbursement from the Missouri Senate for the same phone charges.

For this violation, we impose a fee of \$262, pursuant to § 105.961.4(6).

Summary of Violations

Petitioners violated §§ 130.021.4(1), 130.021.7, 130.031.2, 130.034.2, 130.041.1(3) and (4), 130.041.4, 130.046.1(1), (2), and (3), and 130.046.4.

Fees and Other Orders

As discussed in detail above, we conclude that Petitioners violated a number of the campaign finance disclosure laws of the State of Missouri under Chapter 130, RSMo. Therefore, pursuant to § 105.961.4, we take the following actions:

Count I: Order that Petitioners be reprimanded for not filing an amended report, including depository account information, within 20 days of the reportable event/change.

Count II: Order Petitioners to amend all outstanding reports/time periods not previously submitted; and

Impose the following fees:

\$1,000 for failure to timely file disclosure reports

\$1,000 for failure to account for the decrease in cash on hand from April 2010 and April 2011.

Count III: Order that Petitioners be reprimanded for contributions reported but not shown on official depository account records;

Order Petitioners to amend report of contributions over \$100 to account for omitted contributions and to hereafter cease such violations by providing name, address, employer/occupation information for all campaign contributors that donate in excess of \$100 in the aggregate to any future campaign; and

Impose the following fees:

\$1,000 for failure to report contributors' addresses;

\$69,092 for failure to report campaign contributions.

Count IV: Order Petitioners to amend reports to reflect previously unreported expenditures;

Order that Petitioners be reprimanded for expenditures of over \$100 improperly listed as campaign gas, food, parking and incidentals; and

Impose the following fees:

\$1,000 for filing reports with no address information for campaign workers paid from campaign funds;

\$146,839 for failure to report campaign expenditures.

Count V: Impose fee of \$6,653 for improper cash expenditures of greater than \$50 each.

Count VI: Impose one fee of \$1,000 for listing expenditures as "consulting services" and other vague descriptors and failing to file supplemental independent contractor reports.

Count VIII: Impose fees of:

- \$1,257 for travel expenses while Senate out of session
- \$861 for travel expenses while Senate in session
- \$262 for phone bill expenses

Total Fees imposed: \$229,964, of which \$22,996 shall be paid within 90 days of the date of this decision. The remainder of the fees shall be stayed provided that Petitioners timely pay the initial ten percent, file all required campaign finance disclosure reports and amendments as provided in this decision within 90 days, and commit no further violations of the campaign financial disclosure laws under Chapter 130, during the two-year period beginning on the date of this decision.

The MEC asks that we impose any fees upon Wright-Jones and the Committee jointly and severally. Although it cites no authority supporting that request, joint and several liability is “appropriate where several persons combine to produce ‘a single and indivisible harm.’” *Conopco, Inc. v. May Dept. Stores Co.*, 797 F.Supp. 740 (E.D. Mo., 1992) (internal citation omitted). We see no distinction between the actions of Wright-Jones and the Committee in this case. Therefore, we agree with the MEC. Petitioners Wright-Jones and Wright-Jones for Missouri shall be jointly and severally liable for all fees, and responsible for all obligations, imposed herein.

All fees shall be paid by check or money order directly to the MEC.

SO ORDERED on June 26, 2014.

/s/ Karen A. Winn

KAREN A. WINN

Commissioner

APPENDIX A:

Contributions Not Timely Reported		
Contributor	Date	Amount
Consulting Engineers Council of MO/PAC	6/3/2008	\$200.00
WPC EMPAC	6/18/2008	\$500.00
D & S Prenger	7/15/2008	\$200.00
Basilico Engineering Inc.	7/15/2008	\$300.00
United Steelworkers of America local 169	7/15/2008	\$300.00
BDR - Beck Disaster Recovery	7/15/2008	\$500.00
Jerome and Cindy Shaw	7/15/2008	\$500.00
Robert and Pamela Affholder	7/15/2008	\$500.00
Cash	7/18/2008	\$100.00
Joan G Botwinick	7/18/2008	\$200.00
Pittsburgh Pipe	7/18/2008	\$675.00
Sterling S Miller	7/21/2008	\$350.00
Joann Williams	7/22/2008	\$200.00
Susan Talve and James Stone Goodman	7/22/2008	\$200.00
Margaret Pedersen	7/22/2008	\$300.00
Maida J Coleman	7/23/2008	\$150.00
Angelia M Elgin	7/23/2008	\$500.00
Hudson and Assoc., LLC, Sheila A Hudson	7/23/2008	\$500.00
Maida Jean Coleman	7/23/2008	\$675.00
Credit Union PAC	7/24/2008	\$375.00
Unite here Missouri PAC	7/24/2008	\$650.00
Missouri State UAW PAC	7/24/2008	\$675.00
AT&T Missouri	7/25/2008	\$100.00
AT&T Missouri	7/25/2008	\$100.00
AT&T Missouri	7/25/2008	\$200.00
AT&T Missouri	7/25/2008	\$250.00
AT&T Missouri	7/25/2008	\$250.00
AT&T Missouri	7/25/2008	\$250.00
Operating Engineers Local 101 PAC	7/25/2008	\$675.00
18th Senatorial District Democratic Committee	7/28/2008	\$500.00
Emily's List NF Fund	7/31/2008	\$675.00
Urban Planning & Development Corp	8/5/2008	\$250.00
Joseph M Dorsey Jr. DDS MS	8/5/2008	\$325.00
North County Labor Legislative Club	8/5/2008	\$600.00
Philip M Hess	9/5/2008	\$300.00
Home Building Industry PAC	9/22/2008	\$500.00
Missouri Professionals Mutual	9/22/2008	\$675.00
Metal Container Corp	9/22/2008	\$1,000.00
Friends of Steve Brown	10/6/2008	\$200.00
Public Eye Inc. Paristyle Building	10/6/2008	\$250.00

Contributions Not Timely Reported		
Contributor	Date	Amount
Friends of Missouri State University PAC	10/6/2008	\$300.00
Health Care Leadership Committee State Acct	10/6/2008	\$500.00
AFSCME Missouri People Public Employees	10/6/2008	\$675.00
Credit Union PAC	10/6/2008	\$675.00
MBA Gateway Region PAC	10/6/2008	\$675.00
Missouri State Teachers Association Leg	10/6/2008	\$675.00
Pfizer	10/6/2008	\$675.00
AT&T Missouri Employee PAC	10/6/2008	\$750.00
AGC of St Louis PAC	10/6/2008	\$1,000.00
Victor Callahan DBA Callahan for State Senate	10/6/2008	\$2,000.00
Group Health Plan	10/7/2008	\$500.00
Plumbing Industry Council	10/9/2008	\$200.00
Missouri Pharmacy PAC	10/9/2008	\$500.00
United Transportation Union PAC	10/9/2008	\$600.00
BNSF Railway Company	10/9/2008	\$2,000.00
Supporters of Health Research & Treatments	10/9/2008	\$2,500.00
Ameren UE PAC	10/10/2008	\$750.00
Bennie L Lewis & Associates LLC	10/17/2008	\$300.00
Novartis Pharmaceuticals Corp	10/17/2008	\$500.00
Bank of Missouri PAC	10/17/2008	\$675.00
Leonard S Dino, Jr. & Carrie N Dino	10/17/2008	\$1,000.00
14th Ward Democratic Organization	10/23/2008	\$250.00
Ameristar Casino Kansas City Inc	10/23/2008	\$500.00
Ameristar Casino St Charles	10/23/2008	\$500.00
ARDA ROC-PAC/MO	10/23/2008	\$500.00
Missouri Energy Development Assoc. PAC	10/23/2008	\$675.00
St Louis Assoc. of Realtors PAC	10/23/2008	\$675.00
Ameren UE PAC	10/23/2008	\$750.00
John Bardgett & Associates Inc	10/23/2008	\$1,000.00
Missouri Dental Hygienist PAC	10/29/2008	\$500.00
MO Association of Nurse Anesthetists PAC	10/29/2008	\$500.00
IBEW Educational Committee	10/29/2008	\$650.00
Consulting Engineers Council of MO/PAC	11/5/2008	\$500.00
Site Improvement Assoc. SITEPAC	11/5/2008	\$500.00
Altria Client Services Inc	11/5/2008	\$1,000.00
Johnny Investment Inc	11/20/2008	\$1,067.00
Missouri Independent Bankers Association PAC	5/21/2009	\$625.00
Anheuser-Busch Cos Inc	6/5/2009	\$1,350.00
Legacy Building Group LLC	6/11/2009	\$1,500.00
International Union of Elevator Contractors 3	8/5/2009	\$500.00
Maurice A Watson	9/4/2009	\$200.00
Advantage Capital Management Corp	9/9/2009	\$250.00

Contributions Not Timely Reported		
Contributor	Date	Amount
Don M Holt	10/8/2009	\$150.00
Site Improvement Association SITEPAC	10/13/2009	\$250.00
Ameren UE PAC	10/30/2009	\$500.00
Missouri State UAW PAC	10/30/2009	\$500.00
AstraZeneca Zeneca Services	10/30/2009	\$650.00
C.L. Smith Company	11/3/2009	\$250.00
St Louis Labor Council AFL-CIO Project 2000	11/3/2009	\$250.00
Waste Management	11/3/2009	\$350.00
United Transportation Union PAC	11/3/2009	\$600.00
Life Sciences Fund of The Greater KC Chamber PAC	11/3/2009	\$1,500.00
Johnson and Johnson Services Inc	11/6/2009	\$500.00
Pinnacle Entertainment	11/6/2009	\$1,000.00
Missouri Energy Development Association PAC	11/13/2009	\$200.00
David Mason & Associates	11/13/2009	\$500.00
Tri-Tec Inc	11/13/2009	\$800.00
Gateway Contractors	11/13/2009	\$1,000.00
Union Seventy Partnership	11/13/2009	\$1,250.00
Kozeny-Wagner Inc.	11/13/2009	\$1,500.00
AT&T Missouri Employee PAC	11/24/2009	\$750.00
Ameren UE PAC	12/16/2009	\$500.00
Bank of Missouri PAC	12/16/2009	\$1,000.00
Bernardin, Lochmueller & Associates, Inc	12/28/2009	\$500.00
Missouri Dental Hygienist PAC	12/28/2009	\$500.00
Ameristar Casino Kansas City Inc	1/4/2010	\$250.00
Ameristar Casino St Charles	1/4/2010	\$250.00
Simmons Attorneys at Law	1/4/2010	\$1,000.00
Supporters of Health Research & Treatments	1/4/2010	\$1,500.00
Monsanto Company	4/6/2010	\$500.00
PFHC PAC	4/9/2010	\$2,000.00
Dealers Interested in Government	4/23/2010	\$1,000.00
Penn National Gaming Inc	6/21/2010	\$500.00
	Total	\$69,092.00

Respondent's Exhibit 144; Tr. at 51-52, 60-61.

Appendix B

Expenditures Not Timely Reported		
Payee	Date	Amount
Fed Ex Kinkos	6/2/2008	\$40.95
Damon A Jones	6/2/2008	\$102.00
Ink Spot	6/2/2008	\$118.52
Glen Burlugh	6/3/2008	\$27.02
Office Max	6/5/2008	\$235.86
Cheryl Dozer	6/7/2008	\$50.00
Office Max	6/9/2008	\$43.09
Ink Spot	6/9/2008	\$346.45
Cash	6/12/2008	\$120.00
Office Max	6/17/2008	\$103.09
Home Depot	6/17/2008	\$111.11
Tonya Finley	6/18/2008	\$100.00
Par or Better	6/19/2008	\$100.00
WPC	6/19/2008	\$120.00
AT&T	6/20/2008	\$91.37
Sprint ach Bill Pay	6/20/2008	\$145.00
AT&T	6/20/2008	\$421.24
O.R. Pechman	6/20/2008	\$457.90
Cashier Check Fee	6/23/2008	\$2.00
Cash	6/23/2008	\$150.00
Cash	6/23/2008	\$1,620.00
Extra Space Storage	6/24/2008	\$163.00
Ink Spot	6/24/2008	\$712.32
Michael Henderson	6/25/2008	\$600.00
O.R. Pechman	6/26/2008	\$1,198.62
Tonya Finley	6/30/2008	\$100.00
Office Max	7/1/2008	\$52.01
Office Max	7/1/2008	\$98.70
Cash	7/3/2008	\$120.00
Office Max	7/14/2008	\$60.50
Cash	7/15/2008	\$100.00
St Louis Pro-Sort	7/16/2008	\$3,875.03
Damon A Jones	7/18/2008	\$100.00
Wireless Store	7/21/2008	\$26.88
Cash	7/21/2008	\$200.00
Harland Clarke	7/22/2008	\$7.08
John Bowman	7/23/2008	\$100.00
Sprint ach Bill Pay	7/23/2008	\$163.51

Expenditures Not Timely Reported		
Payee	Date	Amount
AT&T	7/24/2008	\$740.62
Cash Disbursed	7/24/2008	\$1,800.00
Corporate Checking	7/25/2008	\$1,118.65
Cash Disbursed	7/26/2008	\$400.00
Steve Chalmers	7/29/2008	\$100.00
Cash	7/30/2008	\$200.00
Lingridge Trading	8/1/2008	\$1,000.00
Cash	8/2/2008	\$350.00
O.R. Pechman	8/4/2008	\$508.73
Cash	8/4/2008	\$750.00
DaVita Hanson	8/4/2008	\$1,000.00
Committee to Elect Jeff Hardin	8/5/2008	\$175.00
Cash	8/5/2008	\$1,800.00
Inkosi Design	8/5/2008	\$2,100.00
Jasmine Cannon	8/6/2008	\$100.00
19th Ward Reg Democratic	8/6/2008	\$150.00
Original 27th Ward Org	8/7/2008	\$300.00
Ink Spot	8/7/2008	\$2,211.00
Calvin Walker	8/8/2008	\$100.00
MCB	8/12/2008	\$20.00
World's Fair Donuts	8/12/2008	\$56.00
Office Max	8/12/2008	\$65.92
Creative Litho	8/12/2008	\$286.84
Creative Litho	8/12/2008	\$681.92
Pappy's Smokehouse	8/14/2008	\$26.47
Drake Plaza	8/14/2008	\$40.00
Kohner Drake Plaza	8/14/2008	\$1,501.00
Clear Channel	8/15/2008	\$300.00
Cash	8/16/2008	\$100.00
Cash	8/16/2008	\$100.00
Exxon Mobile	8/18/2008	\$43.74
Sprint ach Bill Pay	8/20/2008	\$165.04
The Best Steak House	8/21/2008	\$26.93
Extra Space Storage	8/21/2008	\$163.00
Burger Bar	8/22/2008	\$52.00
Cash	8/22/2008	\$600.00
Dollar Tree	8/23/2008	\$23.23
Applebee's	8/25/2008	\$48.57
Frontier AG	8/26/2008	\$57.84
Sleep Inn	8/27/2008	\$26.50
Willie G's	8/27/2008	\$80.00
Sleep Inn	8/27/2008	\$530.02

Expenditures Not Timely Reported		
Payee	Date	Amount
Pappa Deaux Seafood Kitchen	8/28/2008	\$45.00
Sleep Inn	9/1/2008	\$570.96
Sleep Inn	9/1/2008	\$713.70
BP	9/5/2008	\$45.97
Home Town Buffet	9/7/2008	\$36.11
AT&T	9/8/2008	\$424.13
AT&T	9/8/2008	\$543.93
Drake Plaza Apts.	9/8/2008	\$950.00
JCT Fuel and Grocery	9/9/2008	\$36.45
DaVita Hanson	9/9/2008	\$300.00
Damon A Jones	9/9/2008	\$500.00
Office Max	9/12/2008	\$146.98
4th Ward Reg. Dems	9/12/2008	\$300.00
Barnes and Noble	9/13/2008	\$76.29
BP	9/15/2008	\$30.01
Cheryl Dozer	9/15/2008	\$100.00
John Bowman	9/15/2008	\$700.00
The Fountain	9/18/2008	\$45.00
Office Max	9/18/2008	\$247.90
AT&T	9/18/2008	\$388.56
Target	9/19/2008	\$14.43
Office Max	9/19/2008	\$177.47
DaVita Hanson	9/19/2008	\$750.00
Smitty's	9/20/2008	\$45.01
Home Depot	9/22/2008	\$30.54
MO Progressive Vote	9/22/2008	\$100.00
AT&T	9/22/2008	\$123.69
MO Jobs with Justice	9/22/2008	\$150.00
Home Depot	9/22/2008	\$176.87
National Black Caucus of State Legislators	9/22/2008	\$475.00
Deebru Shurn	9/22/2008	\$500.00
Extra Space Storage	9/23/2008	\$174.00
Cash	9/25/2008	\$125.00
Cash	9/25/2008	\$125.00
Citizens for Mike McMillan	9/25/2008	\$200.00
Home Depot	9/25/2008	\$465.11
Damon A Jones	9/25/2008	\$500.00
International Institute	9/26/2008	\$17.50
Shell	9/27/2008	\$49.08
Barnes and Noble	9/28/2008	\$79.54
Office Max	9/29/2008	\$92.01
Walter Knoll Florist	9/29/2008	\$143.12

Expenditures Not Timely Reported		
Payee	Date	Amount
Randy Echels	9/29/2008	\$425.00
John Bowman	9/30/2008	\$1,300.00
Vito's Restaurant	10/1/2008	\$31.35
BP	10/1/2008	\$35.00
Tonya Finley	10/1/2008	\$100.00
Firebrick Consulting	10/1/2008	\$457.41
Target	10/2/2008	\$13.30
Applebee's	10/2/2008	\$77.56
Home Depot	10/2/2008	\$77.79
White Castle	10/3/2008	\$27.53
Firebrick Consulting	10/3/2008	\$258.30
Schnucks Market	10/4/2008	\$66.03
Schnucks Market	10/4/2008	\$304.85
BP	10/5/2008	\$44.57
Office Max	10/5/2008	\$269.32
Willie Brown	10/6/2008	\$225.00
Home Depot	10/7/2008	\$9.72
Schnucks Market	10/7/2008	\$12.28
CBTU - Coalition of Black Trade University	10/7/2008	\$30.00
BP	10/7/2008	\$44.74
Drake Plaza Apts.	10/7/2008	\$950.00
Rally's Hamburgers	10/8/2008	\$12.24
The U	10/8/2008	\$29.14
Amtrak	10/8/2008	\$549.00
Panera Bread	10/9/2008	\$8.22
DaVita Hanson	10/10/2008	\$750.00
Steve Chalmers	10/10/2008	\$1,000.00
The Best Steak House	10/11/2008	\$40.43
Panera Bread	10/11/2008	\$48.32
Smitty's	10/13/2008	\$36.83
Ameren	10/14/2008	\$105.00
St Louis City Labor Club	10/14/2008	\$200.00
McDonald's	10/15/2008	\$9.27
USPS	10/15/2008	\$17.80
Kmart	10/15/2008	\$121.43
Sprint ach Bill Pay	10/15/2008	\$185.00
Damon A Jones	10/15/2008	\$500.00
DaVita Hanson	10/15/2008	\$1,000.00
Office Max	10/16/2008	\$23.63
Schnucks Market	10/16/2008	\$35.01
WSJ.com or Barrons.com	10/16/2008	\$89.00
Hilton	10/16/2008	\$132.09

Expenditures Not Timely Reported		
Payee	Date	Amount
John Bowman	10/20/2008	\$2,500.00
City of St Louis	10/21/2008	\$10.00
City of St Louis	10/21/2008	\$10.00
Extra Space Storage	10/21/2008	\$174.00
Baker for Congress	10/21/2008	\$750.00
Cash	10/22/2008	\$100.00
Parking Division - L C Williams	10/22/2008	\$450.00
Missouri House Democratic Campaign Committee	10/22/2008	\$750.00
Rally's Hamburgers	10/23/2008	\$11.88
MPC 44	10/23/2008	\$35.91
Judi Sharp	10/23/2008	\$84.78
St Alphonsus Church	10/23/2008	\$125.00
Costco	11/3/2008	\$511.28
Vernon Johnson	11/18/2008	\$75.00
Convenient Food Mart	12/2/2008	\$28.14
Pick A Dilly	12/8/2008	\$21.10
BP	12/8/2008	\$30.37
Citizens for Ortman	12/9/2008	\$100.00
Hilton	12/10/2008	\$105.13
MPC 44	1/1/2009	\$25.96
Mid America Coaches	1/3/2009	\$686.00
Franklin Covey	1/5/2009	\$32.07
Cash	1/5/2009	\$1,410.00
Ameren	1/16/2009	\$101.74
Transfer to Share	1/20/2009	\$10.00
Sprint ach Bill Pay	1/22/2009	\$149.00
QT	1/26/2009	\$26.00
Extra Space Storage	1/27/2009	\$89.00
Exxon Mobile	1/31/2009	\$19.93
Schnucks Market	2/1/2009	\$51.35
Exxon Mobile	2/2/2009	\$25.73
AT&T	2/2/2009	\$351.60
Office Max	2/7/2009	\$15.23
Exxon Mobile	2/7/2009	\$25.67
Cash	2/27/2009	\$50.00
DaVita Hanson	3/2/2009	\$250.00
AT&T	3/3/2009	\$180.00
Holiday Inn	3/9/2009	\$211.44
Schnucks Market	3/18/2009	\$137.51
DaVita Hanson	3/20/2009	\$250.00
Scott Joplin House	3/21/2009	\$550.00
Drake Plaza Apts.	3/23/2009	\$426.00

Expenditures Not Timely Reported		
Payee	Date	Amount
AT&T	3/24/2009	\$60.00
Sprint ach Bill Pay	3/24/2009	\$175.00
AT&T	3/24/2009	\$220.00
Ameren	3/26/2009	\$227.00
Ameren	3/29/2009	\$263.50
Park Tickets 444	3/31/2009	\$100.00
PWW	4/3/2009	\$350.00
Damon A Jones	4/15/2009	\$200.00
Office Max	4/17/2009	\$28.13
Schnucks Market	4/17/2009	\$38.28
Exxon Mobile	4/18/2009	\$22.45
Shell	4/20/2009	\$6.87
Shell	4/20/2009	\$35.01
John Bowman	4/20/2009	\$36.00
Schnucks Market	4/22/2009	\$48.48
Walgreens	4/23/2009	\$17.77
ABC Trading Wholesale	4/26/2009	\$98.70
Extra Space Storage	4/28/2009	\$95.00
MPC 44	4/29/2009	\$37.87
Eagle Stop	4/30/2009	\$20.26
BP	5/3/2009	\$42.18
DaVita Hanson	5/4/2009	\$100.00
Exxon Mobile	5/9/2009	\$26.81
Credit Protection	5/10/2009	\$293.55
DaVita Hanson	5/11/2009	\$350.00
Office Max	5/12/2009	\$72.93
Parking Division - L C Williams	5/12/2009	\$450.00
Smittys	5/13/2009	\$33.57
Joes Lion Service	5/18/2009	\$19.95
Holts Summit	5/18/2009	\$24.68
QT	5/19/2009	\$51.42
BJ Foundation	5/19/2009	\$1,000.00
Exxon Mobile	5/20/2009	\$60.15
Cash	5/20/2009	\$100.00
Provisions	5/21/2009	\$22.96
Schnucks Market	5/21/2009	\$28.44
Sprint ach Bill Pay	5/21/2009	\$250.00
AT&T	5/22/2009	\$88.56
AT&T	5/22/2009	\$250.00
Amtrak	5/23/2009	\$6.00
Schnucks Market	5/23/2009	\$14.10
BP	5/23/2009	\$44.70

Expenditures Not Timely Reported		
Payee	Date	Amount
Whole Foods Market	5/23/2009	\$110.40
Office Max	5/23/2009	\$127.51
Extra Space Storage	5/26/2009	\$75.00
Ameren	5/26/2009	\$107.67
Ronnie Richardson & Assocs.	6/1/2009	\$1,500.00
Amoco	6/6/2009	\$15.38
ATM	6/6/2009	\$102.00
Payless Shoesource	6/13/2009	\$33.77
Cash	6/16/2009	\$100.00
ATM withdraw fee	6/21/2009	\$1.00
ATM	6/21/2009	\$102.00
Cash	6/25/2009	\$250.00
DaVita Hanson	7/1/2009	\$1,500.00
Ronnie Richardson & Assocs.	7/2/2009	\$1,500.00
Schnucks Market	7/3/2009	\$10.73
BP	7/3/2009	\$51.80
Shop 'N Save	7/3/2009	\$99.11
Lane Bryant	7/4/2009	\$16.31
JC Penny Store	7/4/2009	\$60.35
Schnucks Market	7/5/2009	\$36.22
Office Max	7/5/2009	\$283.95
Schnucks Market	7/6/2009	\$62.48
Sunglass Hut	7/6/2009	\$141.09
AT&T	7/7/2009	\$317.61
Triumph Grill	7/8/2009	\$58.44
QT	7/9/2009	\$17.59
ATM withdraw fee	7/10/2009	\$1.00
BP	7/10/2009	\$32.00
Friends of Kacie Starr Triplett	7/10/2009	\$100.00
Gordon Biersch-Kansas	7/10/2009	\$110.00
ATM	7/10/2009	\$202.95
ATM withdraw fee	7/12/2009	\$1.00
BP	7/12/2009	\$24.57
ATM	7/12/2009	\$62.95
Marriott Hotels	7/12/2009	\$789.18
Marriott Hotels	7/13/2009	\$50.00
Marriott Hotels	7/14/2009	\$15.00
Harland Clarke	7/14/2009	\$17.00
BP	7/14/2009	\$38.00
Reliable Funeral Home	7/14/2009	\$250.00
Missouri Legislative Black Caucus Foundation	7/15/2009	\$600.00
Harland Clarke	7/16/2009	\$10.14

Expenditures Not Timely Reported		
Payee	Date	Amount
Alex's Rest & Lounge	7/17/2009	\$115.00
AT&T	7/17/2009	\$429.35
Vito's Restaurant	7/18/2009	\$34.42
Holts Summit	7/18/2009	\$41.62
Capitol Plaza	7/18/2009	\$77.51
Cheryl Dozer	7/19/2009	\$200.00
Office Max	7/20/2009	\$92.52
Harmony Grand Chapter OES	7/20/2009	\$400.00
Extra Space Storage	7/26/2009	\$96.00
Extra Space Storage	7/30/2009	\$74.00
Hobby Lobby	7/30/2009	\$116.34
QT	7/31/2009	\$62.71
Red Lobster	8/2/2009	\$70.00
John Bowman	8/3/2009	\$100.00
State Chapter of Senior Citizens	8/4/2009	\$100.00
Missouri Democratic Party	8/4/2009	\$200.00
DaVita Hanson	8/4/2009	\$1,500.00
MO Kan	8/5/2009	\$175.00
Radio WGNU	8/5/2009	\$200.00
Better Family Life	8/5/2009	\$275.00
Ronnie Richardson & Assocs.	8/5/2009	\$1,500.00
Suw Unique Garden Club	8/6/2009	\$1,000.00
Hooters	8/7/2009	\$50.00
The Organization for Black Struggle	8/7/2009	\$150.00
White Castle	8/10/2009	\$9.50
BP	8/10/2009	\$51.68
Gateway Alarm	8/10/2009	\$69.00
SEIU	8/10/2009	\$1,000.00
CSI Telecommunication	8/11/2009	\$1,000.00
Smoking Joes	8/13/2009	\$30.00
Distinctions	8/13/2009	\$1,664.33
QVC	8/17/2009	\$96.43
BP	8/21/2009	\$48.20
AT&T	8/21/2009	\$399.32
Walgreens	8/22/2009	\$17.74
Exxon Mobile	8/22/2009	\$33.92
Jasance Razland	8/25/2009	\$125.00
St James AME Church	8/25/2009	\$750.00
Forever 21	8/26/2009	\$28.98
Sears	8/26/2009	\$39.68
Extra Space Storage	8/27/2009	\$74.00
ABC Trading Wholesale	8/27/2009	\$82.65

Expenditures Not Timely Reported		
Payee	Date	Amount
Schaeffer's Hobby	8/28/2009	\$7.91
Lane Bryant	8/28/2009	\$44.91
Schnucks Market	8/28/2009	\$73.68
Office Max	8/28/2009	\$162.34
Office Max	8/28/2009	\$386.37
Target	8/29/2009	\$37.87
Smittys	8/29/2009	\$44.95
USPS	8/29/2009	\$55.00
Lubeleys Bakery	8/31/2009	\$77.87
McMahon Pontiac	8/31/2009	\$89.66
Party City	8/31/2009	\$113.00
Sprint ach Bill Pay	9/2/2009	\$266.12
WGNU	9/2/2009	\$800.00
BP	9/4/2009	\$46.62
Jasance Razland	9/4/2009	\$400.00
DaVita Hanson	9/4/2009	\$3,650.00
Red Lobster	9/5/2009	\$47.88
Office Max	9/6/2009	\$31.34
Schnucks Market	9/6/2009	\$31.76
Pick A Dilly	9/7/2009	\$5.19
Pick A Dilly	9/7/2009	\$35.25
Ameren	9/8/2009	\$135.59
John Bowman	9/9/2009	\$1,977.00
Political Resource & Solutions	9/9/2009	\$2,500.00
Schnucks Market	9/10/2009	\$55.54
Office Max	9/10/2009	\$135.79
Cash	9/10/2009	\$150.00
Target	9/11/2009	\$35.31
Whole Foods Market	9/12/2009	\$30.93
Bob J Leach Inc.	9/12/2009	\$45.76
Dillard's	9/12/2009	\$97.04
White Castle	9/14/2009	\$13.84
Schnucks Market	9/14/2009	\$14.87
Exxon Mobile	9/16/2009	\$44.45
Distinctions	9/16/2009	\$125.00
Schnucks Market	9/17/2009	\$82.91
Garden Ridge Store	9/17/2009	\$84.62
QVC	9/17/2009	\$96.43
Cheryl Dozer	9/17/2009	\$200.00
Capitol Plaza	9/18/2009	\$77.51
AT&T Cons Phone	9/18/2009	\$147.64
AT&T Cons Phone	9/18/2009	\$449.20

Expenditures Not Timely Reported		
Payee	Date	Amount
McDonald's	9/19/2009	\$21.18
Captain Ds	9/19/2009	\$43.85
MPC 44	9/19/2009	\$44.50
The Ink Spot	9/19/2009	\$149.78
Parties and Props	9/19/2009	\$400.00
Weinhardt Party	9/20/2009	\$43.30
Party City	9/20/2009	\$48.47
Extra Space Storage	9/21/2009	\$74.00
Cheryl Dozer	9/21/2009	\$200.00
TLF Walter Knoll	9/22/2009	\$349.75
Jasance Razland	9/22/2009	\$746.78
Ronnie Richardson & Assocs.	9/24/2009	\$1,500.00
BP	9/25/2009	\$37.68
Exxon Mobile	9/28/2009	\$14.00
Tridel Enterprises US	9/29/2009	\$36.34
QT	9/29/2009	\$38.35
Courtyard Marriott	9/29/2009	\$74.32
AT&T	9/29/2009	\$80.00
Original 21st Ward Dem Org	9/29/2009	\$100.00
Ameren	9/30/2009	\$70.80
The Peach Tree	10/1/2009	\$45.10
Break time	10/1/2009	\$47.14
MADCO Printing	10/1/2009	\$700.00
Ozark Oil Co	10/2/2009	\$43.63
Rolla Eagle Stop	10/4/2009	\$6.11
Exxon Mobile	10/4/2009	\$15.00
Naturalizer Shoe Store	10/5/2009	\$80.87
Chateau on the Lake	10/6/2009	\$8.00
Intercontinental	10/7/2009	\$273.44
Marmi #1	10/7/2009	\$306.07
Office Depot	10/8/2009	\$74.46
Smittys	10/9/2009	\$45.96
Schnucks Market	10/10/2009	\$34.79
Dillard's	10/10/2009	\$42.05
Dillard's	10/10/2009	\$191.93
Dillard's	10/10/2009	\$277.11
Home Town Buffet	10/13/2009	\$24.56
TLF Walter Knoll	10/13/2009	\$104.70
Office Max	10/14/2009	\$11.88
Sprint Wireless	10/14/2009	\$177.87
Community Women Against Hardship	10/15/2009	\$100.00
WSJ.com or Barrons.com	10/16/2009	\$129.00

Expenditures Not Timely Reported		
Payee	Date	Amount
QT	10/17/2009	\$41.33
QVC	10/18/2009	\$96.43
BP	10/19/2009	\$50.01
Doubletree Hotel	10/19/2009	\$98.10
Sofitel Hotels	10/19/2009	\$706.26
SEIU MO/KS State Council 29	10/20/2009	\$5,026.18
Schnucks Market	10/21/2009	\$55.64
Schnucks Market	10/21/2009	\$60.00
Dillard's	10/21/2009	\$94.89
Sofitel Hotels	10/24/2009	\$45.00
Chico's	10/24/2009	\$114.65
McCormick & Schmick's	10/26/2009	\$18.00
Extra Space Storage	10/26/2009	\$74.00
Borders Books	10/26/2009	\$81.52
Sofitel Hotels	10/26/2009	\$85.00
Grill on the Alley	10/27/2009	\$16.00
Sprint ach Bill Pay	10/27/2009	\$390.60
Ingrid Owens	10/28/2009	\$120.00
Ronnie Richardson & Assocs.	10/29/2009	\$1,000.00
AT&T	10/30/2009	\$410.91
MPC 44	10/31/2009	\$51.00
QT	11/1/2009	\$50.50
Angie's List	11/2/2009	\$59.00
Collective Catering	11/2/2009	\$266.66
BP	11/3/2009	\$17.26
Northside Community Center	11/3/2009	\$600.00
BP	11/4/2009	\$38.49
QT	11/5/2009	\$22.27
BP	11/6/2009	\$32.00
Joes Lion Service	11/7/2009	\$19.95
Chili's	11/7/2009	\$33.00
Exxon Mobile	11/7/2009	\$51.86
Target	11/11/2009	\$50.76
Red Lobster	11/12/2009	\$116.03
WGNU	11/13/2009	\$800.00
BP	11/14/2009	\$48.75
Holts Summit	11/17/2009	\$6.72
Holts Summit	11/17/2009	\$25.86
Ronnie Richardson & Assocs.	11/17/2009	\$1,500.00
Allen Hortin	11/18/2009	\$33.33
Office Max	11/18/2009	\$154.67
Airtran	11/20/2009	\$272.40

Expenditures Not Timely Reported		
Payee	Date	Amount
BP	11/23/2009	\$52.84
SK Jewelers	11/23/2009	\$102.19
Katie Ann Foundation	11/23/2009	\$250.00
Marquards Cleaners	11/24/2009	\$84.30
Medical West Health	11/25/2009	\$45.17
Extra Space Storage	11/25/2009	\$74.00
Phillips 66	11/27/2009	\$7.65
Holts Summit	11/28/2009	\$49.83
Convenient Food Mart	11/30/2009	\$13.48
Convenient Food Mart	11/30/2009	\$50.85
Ruby Tuesday	12/2/2009	\$48.44
Rosco's Family	12/4/2009	\$27.38
QT	12/5/2009	\$19.28
National Black Caucus of State Legislators	12/5/2009	\$575.00
Exxon Mobile	12/7/2009	\$41.96
Cheryl Dozer	12/7/2009	\$400.00
Citizens for Ortman	12/8/2009	\$100.00
ATM withdraw fee	12/9/2009	\$1.00
ATM	12/9/2009	\$43.25
Holts Summit	12/10/2009	\$43.54
Sprint ACH Bill Pay	12/10/2009	\$232.84
White Castle	12/11/2009	\$11.99
Hibachi	12/13/2009	\$18.11
BP	12/13/2009	\$50.56
Vito's Restaurant	12/14/2009	\$25.00
AT&T	12/14/2009	\$143.36
Walgreens	12/14/2009	\$213.30
AT&T	12/14/2009	\$681.71
ATM withdraw fee	12/15/2009	\$1.00
ATM	12/15/2009	\$20.00
Convenient Food Mart	12/15/2009	\$31.62
McDonald's	12/17/2009	\$12.28
Walker Pearson	12/17/2009	\$300.00
White Castle	12/19/2009	\$13.36
Home Town Buffet	12/20/2009	\$36.74
Whole Foods Market	12/20/2009	\$221.12
ATM withdraw fee	12/21/2009	\$1.00
ATM	12/21/2009	\$43.00
BP	12/21/2009	\$47.50
MPC 44	12/21/2009	\$47.77
Panera Bread	12/22/2009	\$22.64
Schnucks Market	12/22/2009	\$79.95

Expenditures Not Timely Reported		
Payee	Date	Amount
GameStop	12/22/2009	\$100.00
White Castle	12/23/2009	\$13.99
Schnucks Market	12/23/2009	\$23.46
Borders Books	12/23/2009	\$98.39
Sprint ach Bill Pay	12/23/2009	\$211.49
Target	12/23/2009	\$217.12
Parking Division - L C Williams	12/23/2009	\$450.00
Ronnie Richardson & Assocs.	12/24/2009	\$1,500.00
WGNU	12/24/2009	\$1,600.00
BP	12/29/2009	\$50.84
Vincent's Jeweler	12/30/2009	\$20.59
Oscar's Café	12/30/2009	\$30.00
Schnucks Market	12/31/2009	\$186.41
AT&T Bus Phone	1/4/2010	\$205.65
Gateway Alarm	1/8/2010	\$342.00
Schnucks Market	1/9/2010	\$134.74
Journal Entry	1/11/2010	\$120.00
John Bardgett & Assoc.	1/11/2010	\$1,000.00
Extra Space Storage	1/21/2010	\$79.00
Schnucks Market	1/24/2010	\$9.20
Schnucks Market	1/24/2010	\$93.49
AT&T Bus Phone	1/25/2010	\$395.66
Phillips 66	1/28/2010	\$4.09
WGNU	1/28/2010	\$1,000.00
Holts Summit	1/29/2010	\$45.70
Garden Ridge Store	1/29/2010	\$146.68
Hobby Lobby	1/29/2010	\$174.90
Cheryl Dozer	1/29/2010	\$400.00
Phillip Berry	2/1/2010	\$350.00
BP	2/2/2010	\$45.34
QT	2/3/2010	\$47.25
Sprint ach Bill Pay	2/3/2010	\$199.27
Schnucks Market	2/5/2010	\$120.49
QT	2/7/2010	\$35.12
Ameren	2/9/2010	\$225.10
Friends of Kacie Starr Triplett	2/9/2010	\$366.00
John Bowman	2/12/2010	\$100.00
BP	2/13/2010	\$45.91
Petro	2/18/2010	\$6.76
Exxon Mobile	2/18/2010	\$37.68
Exxon Mobile	2/21/2010	\$14.00
House Inner Circle	2/23/2010	\$20.00

Expenditures Not Timely Reported		
Payee	Date	Amount
Sasha's on Shaw LLC	2/23/2010	\$30.00
Citizens for John Haigler	2/23/2010	\$250.00
Extra Space Storage	2/25/2010	\$79.00
USPS	2/26/2010	\$55.00
Sprint ach Bill Pay	2/26/2010	\$160.00
QT	2/27/2010	\$45.71
Lafayette Fire Comp.	2/27/2010	\$46.00
Schnucks Market	3/2/2010	\$31.46
The Women's Safe House	3/2/2010	\$365.00
Pick A Dilly	3/4/2010	\$3.43
Evelyn Thomas	3/4/2010	\$37.00
Sprint ach Bill Pay	3/4/2010	\$77.47
Office Max	3/5/2010	\$25.37
Pick A Dilly	3/5/2010	\$35.91
Crown Food Mart	3/22/2010	\$46.66
Sprint PCS	3/25/2010	\$53.86
Sprint PCS	3/25/2010	\$205.00
Crown Food Mart	3/26/2010	\$50.23
Stand up for Power	3/26/2010	\$300.00
Extra Space Storage	4/1/2010	\$80.00
Wal-Mart	4/4/2010	\$136.81
Crown Food Mart	4/5/2010	\$57.53
White Castle	4/6/2010	\$6.92
AT&T Cons Phone	4/6/2010	\$143.23
AT&T Bus Phone	4/6/2010	\$171.14
AT&T Cons Phone	4/6/2010	\$433.59
Lees Chicken	4/8/2010	\$9.14
Schnucks Market	4/9/2010	\$1.00
Schnucks Market	4/9/2010	\$43.00
QT	4/9/2010	\$54.21
Office Max	4/9/2010	\$508.71
Truman Hotel	4/10/2010	\$42.08
ABC Trading Wholesale	4/10/2010	\$50.08
Container Store	4/10/2010	\$58.56
Whole Foods Market	4/10/2010	\$64.66
Lees Chicken	4/13/2010	\$15.98
Ameren	4/13/2010	\$234.93
Gateway Alarm	4/14/2010	\$64.00
ARFAM-C of St Louis	4/14/2010	\$125.00
Convenient Food Mart	4/15/2010	\$50.82
Crown Food Mart	4/19/2010	\$47.94
Crown Food Mart	4/20/2010	\$40.82

Expenditures Not Timely Reported		
Payee	Date	Amount
Extra Space Storage	4/20/2010	\$79.00
BP	4/23/2010	\$58.41
Sprint ach Bill Pay	4/23/2010	\$393.61
AT&T Bus Phone	4/26/2010	\$177.84
WGNU	4/28/2010	\$1,000.00
Pick A Dilly	4/30/2010	\$39.83
Borders Books	5/3/2010	\$34.69
Committee to Elect Clem Smith	5/21/2010	\$100.00
ATM withdraw fee	5/22/2010	\$1.00
ATM	5/22/2010	\$43.00
McDonald's	5/23/2010	\$2.48
Extra Space Storage	5/26/2010	\$79.00
Whole Foods Market	5/27/2010	\$46.12
Sprint ach Bill Pay	6/2/2010	\$75.00
Fee	6/4/2010	\$15.00
Fee	6/10/2010	\$15.00
Crown Food Mart	6/19/2010	\$30.00
Schnucks Market	6/20/2010	\$43.18
Whole Foods Market	6/20/2010	\$68.13
Copy Fee from bank	6/21/2010	\$25.00
Crown Food Mart	6/21/2010	\$48.64
Clayton Specialist Dr.	6/22/2010	\$25.00
Extra Space Storage	6/23/2010	\$79.00
Office Max	7/6/2010	\$38.89
BP	7/6/2010	\$47.67
Renaissance Hotels	7/12/2010	\$12.00
Staples	7/12/2010	\$35.58
Wal-Mart	7/13/2010	\$50.21
Five Guys	7/16/2010	\$20.44
Gas Mart BP	7/17/2010	\$46.14
Office Max	7/20/2010	\$39.05
Red Lobster	7/22/2010	\$55.00
Penn Station Hampton	7/25/2010	\$22.90
Captain Ds	7/27/2010	\$9.12
Five Star Senior Center	7/27/2010	\$30.00
Phillips 66	7/27/2010	\$42.56
Westland Travel	7/28/2010	\$43.03
Captain Ds	7/29/2010	\$9.76
McDonald's	7/29/2010	\$11.18
Westin Crown Center	7/29/2010	\$18.00
Walgreens	7/30/2010	\$6.40
Wal-Mart	8/3/2010	\$34.57

Expenditures Not Timely Reported		
Payee	Date	Amount
Whole Foods Market	8/3/2010	\$45.33
Crown Food Mart	8/7/2010	\$30.00
White Castle	8/8/2010	\$18.43
Schnucks Market	8/9/2010	\$20.91
Schnucks Market	8/9/2010	\$23.01
Crown Food Mart	8/10/2010	\$6.46
Crown Food Mart	8/10/2010	\$31.24
BP	8/14/2010	\$37.75
Exxon Mobile	8/24/2010	\$35.00
Office Max	9/24/2010	\$33.70
BP	10/5/2010	\$25.03
McDonald's	10/6/2010	\$14.28
BP	10/21/2010	\$49.67
Burger King	10/25/2010	\$5.95
Wal-Mart	10/26/2010	\$10.71
Schnucks Market	10/26/2010	\$16.48
Hobby Lobby	10/26/2010	\$26.53
Crown Food Mart	10/26/2010	\$29.24
BP	10/29/2010	\$53.89
Red Lobster	10/31/2010	\$60.00
Captain Ds	11/2/2010	\$8.89
Exxon Mobile	11/3/2010	\$18.33
Exxon Mobile	11/3/2010	\$38.26
Westland Travel	11/6/2010	\$46.76
ATM withdraw fee	11/11/2010	\$1.00
New Halls Ferry	11/12/2010	\$20.68
New Halls Ferry	11/12/2010	\$53.09
Crown Food Mart	11/15/2010	\$54.99
Long Horn Steakhouse	11/18/2010	\$60.00
Westland Travel	11/19/2010	\$29.43
White Castle	11/22/2010	\$7.13
Lowe's	11/22/2010	\$25.79
Crown Food Mart	11/22/2010	\$50.20
Schnucks Market	11/22/2010	\$53.07
Schnucks Market	11/23/2010	\$46.61
Westland Travel	12/1/2010	\$48.23
Office Max	12/2/2010	\$16.26
Schnucks Market	12/4/2010	\$37.11
BP	12/4/2010	\$55.86
ATM withdraw fee	12/5/2010	\$1.00
Westland Travel	12/8/2010	\$46.12
ATM withdraw fee	12/13/2010	\$1.00

Expenditures Not Timely Reported		
Payee	Date	Amount
Crown Food Mart	12/16/2010	\$60.22
Marriott Hotels	12/17/2010	\$1.00
Office Depot	12/23/2010	\$30.80
Schnucks Market	12/24/2010	\$63.48
Crown Food Mart	12/25/2010	\$56.67
Westland Travel	12/28/2010	\$4.68
Westland Travel	12/29/2010	\$40.76
Office Max	1/8/2011	\$37.73
Phillips 66	1/12/2011	\$55.98
Office Max	1/15/2011	\$27.34
Crown Food Mart	1/18/2011	\$45.69
Westland Travel	1/21/2011	\$37.41
Office Max	1/22/2011	\$28.74
Amtrak	2/10/2011	\$120.20
St James AME Church	3/29/2011	\$20.00
Sprint ACH Bill Pay	4/5/2011	\$50.00
	TOTAL	\$146,839.11

APPENDIX C:
Food Purchases by Year

2008 Food Purchases			
Payee	Date	Sum of Amount	Statement
Pappy's Smokehouse	8/14/2008	\$26.47	<i>Exhibit 38A at 1</i>
The Best Steak House	8/21/2008	\$26.93	<i>Exhibit 38A at 1</i>
Burger Bar	8/22/2008	\$52.00	<i>Exhibit 38A at 1</i>
Applebee's	8/25/2008	\$48.57	<i>Exhibit 38A at 2</i>
Pappa Deaux Seafood Kitchen	8/28/2008	\$45.00	<i>Exhibit 38A at 2</i>
The Fountain	9/18/2008	\$45.00	<i>Exhibit 39A at 1 (Bates page 28)</i>
Vito's Restaurant	10/1/2008	\$31.35	<i>Exhibit 40A at 1</i>
Applebee's	10/2/2008	\$77.56	<i>Exhibit 40A at 1</i>
White Castle	10/3/2008	\$27.53	<i>Exhibit 40A at 1</i>
Schnucks Market	10/4/2008	\$370.88	<i>Exhibit 40A at 1</i>
Schnucks Market	10/7/2008	\$12.28	<i>Exhibit 40A at 1</i>
Rally's Hamburgers	10/8/2008	\$12.24	<i>Exhibit 40A at 1</i>
The U	10/8/2008	\$29.14	<i>Exhibit 40A at 1</i>
Panera Bread	10/9/2008	\$8.22	<i>Exhibit 40A at 1</i>
Panera Bread	10/11/2008	\$48.32	<i>Exhibit 40A at 2</i>
The Best Steak House	10/11/2008	\$40.43	<i>Exhibit 40A at 2</i>
McDonald's	10/15/2008	\$9.27	<i>Exhibit 40A at 2</i>
Schnucks Market	10/16/2008	\$35.01	<i>Exhibit 40A at 2</i>
Rally's Hamburgers	10/23/2008	\$11.88	<i>Exhibit 40A at 2</i>
Schnucks Market	10/24/2008	\$36.58	<i>Exhibit 40A at 3</i>
Oscars Café	10/30/2008	\$51.92	<i>Exhibit 40A at 3</i>
Applebee's	11/1/2008	\$50.00	<i>Exhibit 41A at 1 (Bates page 36)</i>
Shop 'N Save	11/3/2008	\$84.16	<i>Exhibit 41A at 1 (Bates page 36)</i>
Fox Club	11/3/2008	\$36.13	<i>Exhibit 41A at 1 (Bates page 36)</i>
Schnucks Market	11/4/2008	\$16.49	<i>Exhibit 41A at 1 (Bates page 36)</i>
White Castle	11/17/2008	\$10.73	<i>Exhibit 41A at 2 (Bates page 37)</i>
Rally's Hamburgers	11/21/2008	\$8.10	<i>Exhibit 41A at 2 (Bates page 37)</i>
Whole Foods Market	11/23/2008	\$86.06	<i>Exhibit 41A at 2 (Bates page 37)</i>
Hooters	11/23/2008	\$41.59	<i>Exhibit 41A at 2 (Bates page 37)</i>
Chili's	12/3/2008	\$50.00	<i>Exhibit 42A at 1</i>
Johhny's Barbeque	12/9/2008	\$46.00	<i>Exhibit 42A at 1</i>
O'Charleys	12/12/2008	\$33.39	<i>Exhibit 42A at 1</i>
Fox Club	12/13/2008	\$91.00	<i>Exhibit 42A at 1</i>
Schnucks Market	12/21/2008	\$56.72	<i>Exhibit 42A at 2</i>
Schnucks Market	12/30/2008	\$37.51	<i>Exhibit 42A at 2</i>
TOTAL		\$1,694.46	

2009 Food Purchases			
Payee	Date	Sum of Amount	Statement
Schnucks Market	2/1/2009	\$51.35	<i>Exhibit 44 at 1 (Bates page 52)</i>
Schnucks Market	3/2/2009	\$50.32	<i>Exhibit 45A at 1 (Bates page 13)</i>
Schnucks Market	3/10/2009	\$11.51	<i>Exhibit 45A at 1 (Bates page 13)</i>
Schnucks Market	3/18/2009	\$137.51	<i>Exhibit 45A at 1 (Bates page 13)</i>
Schnucks Market	3/22/2009	\$34.83	<i>Exhibit 45A at 1 (Bates page 13)</i>
Schnucks Market	4/17/2009	\$38.28	<i>Exhibit 46A at 1 (Bates page 20)</i>
Schnucks Market	4/22/2009	\$48.48	<i>Exhibit 46A at 1 (Bates page 20)</i>
Schnucks Market	5/21/2009	\$28.44	<i>Exhibit 47A at 1 (Bates page 27)</i>
Schnucks Market	5/23/2009	\$14.10	<i>Exhibit 47A at 2 (Bates page 28)</i>
Schnucks Market	7/3/2009	\$10.73	<i>Exhibit 49A at 1 (Bates page 40)</i>
Schnucks Market	7/5/2009	\$36.22	<i>Exhibit 49A at 1 (Bates page 40)</i>
Schnucks Market	7/6/2009	\$62.48	<i>Exhibit 49A at 1 (Bates page 40)</i>
Schnucks Market	8/28/2009	\$73.68	<i>Exhibit 50A at 2</i>
Schnucks Market	9/6/2009	\$31.76	<i>Exhibit 51A at 1 (Bates page 20)</i>
Schnucks Market	9/10/2009	\$55.54	<i>Exhibit 51A at 1 (Bates page 20)</i>
Schnucks Market	9/14/2009	\$14.87	<i>Exhibit 51A at 1 (Bates page 20)</i>
Schnucks Market	9/17/2009	\$82.91	<i>Exhibit 51A at 2 (Bates page 21)</i>
Schnucks Market	10/10/2009	\$34.79	<i>Exhibit 52A at 1 (Bates page 34)</i>
Schnucks Market	10/21/2009	\$115.64	<i>Exhibit 52A at 2 (Bates page 35)</i>
Schnucks Market	12/22/2009	\$79.95	<i>Exhibit 54A at 2</i>
Schnucks Market	12/23/2009	\$23.46	<i>Exhibit 54A at 2</i>
Schnucks Market	12/31/2009	\$186.41	<i>Exhibit 54A at 2</i>
Shop 'N Save	7/3/2009	\$99.11	<i>Exhibit 49A at 1 (Bates page 40)</i>
Whole Foods Market	5/23/2009	\$110.40	<i>Exhibit 47A at 2 (Bates page 28)</i>
Whole Foods Market	9/12/2009	\$30.93	<i>Exhibit 51A at 1 (Bates page 20)</i>
Whole Foods Market	12/20/2009	\$221.12	<i>Exhibit 54A at 2</i>
Alex's Rest & Lounge	7/17/2009	\$115.00	<i>Exhibit 49A at 2 (Bates page 41)</i>
Arby's	6/12/2009	\$26.63	<i>Exhibit 48A at 1 (Bates page 33)</i>
Captain Ds	9/19/2009	\$43.85	<i>Exhibit 51A at 2 (Bates page 21)</i>
Chateau on the Lake	10/6/2009	\$8.00	<i>Exhibit 52A at 1 (Bates page 34)</i>
Chili's	11/7/2009	\$33.00	<i>Exhibit 53 at 1 (Bates page 34)</i>
Gordon Biersch-Kansas	7/10/2009	\$110.00	<i>Exhibit 49A at 1 (Bates page 40)</i>
Grill on the Alley	10/27/2009	\$16.00	<i>Exhibit 52A at 2 (Bates page 35)</i>
Hibachi	12/13/2009	\$18.11	<i>Exhibit 54A at 1</i>
Hooters	8/7/2009	\$50.00	<i>Exhibit 50A at 1</i>
Longhorn's	6/2/2009	\$60.00	<i>Exhibit 48A at 1 (Bates page 33)</i>
Lubeley's Bakery	8/31/2009	\$77.87	<i>Exhibit 50A at 2</i>
McCormick & Schmickus	10/26/2009	\$18.00	<i>Exhibit 52A at 2 (Bates page 35)</i>
McDonald's	9/19/2009	\$21.18	<i>Exhibit 51A at 2 (Bates page 21)</i>
McDonald's	12/17/2009	\$12.28	<i>Exhibit 54A at 2</i>
Oscars Café	12/30/2009	\$30.00	<i>Exhibit 54A at 2</i>

2009 Food Purchases			
Payee	Date	Sum of Amount	Statement
Panera Bread	12/22/2009	\$22.64	<i>Exhibit 54A at 2</i>
Red Lobster	3/23/2009	\$85.65	<i>Exhibit 45A at 1 (Bates page 13)</i>
Red Lobster	8/2/2009	\$70.00	<i>Exhibit 50A at 1</i>
Red Lobster	9/5/2009	\$47.88	<i>Exhibit 51A at 1 (Bates page 20)</i>
Red Lobster	11/12/2009	\$116.03	<i>Exhibit 53 at 1 (Bates page 34)</i>
Roscoe's Family	12/4/2009	\$27.38	<i>Exhibit 54A at 1</i>
Ruby Tuesday	12/2/2009	\$48.44	<i>Exhibit 54A at 1</i>
The Peach Tree	10/1/2009	\$45.10	<i>Exhibit 52A at 1 (Bates page 34)</i>
Triumph Grill	7/8/2009	\$58.44	<i>Exhibit 49A at 1 (Bates page 40)</i>
Vito's Restaurant	7/18/2009	\$34.42	<i>Exhibit 49A at 2 (Bates page 41)</i>
Vito's Restaurant	12/14/2009	\$25.00	<i>Exhibit 54A at 1</i>
White Castle	3/20/2009	\$22.57	<i>Exhibit 45A at 1 (Bates page 13)</i>
White Castle	8/10/2009	\$9.50	<i>Exhibit 50A at 1</i>
White Castle	9/14/2009	\$13.84	<i>Exhibit 51A at 1 (Bates page 20)</i>
White Castle	12/11/2009	\$11.99	<i>Exhibit 54A at 1</i>
White Castle	12/19/2009	\$13.36	<i>Exhibit 54A at 2</i>
White Castle	12/23/2009	\$13.99	<i>Exhibit 54A at 2</i>
	TOTAL	\$2,990.97	

2010 Food Purchases			
Payee	Date	Sum of Amount	Statement
Schnucks Market	1/6/2010	\$49.71	<i>Exhibit 55A at 1 (Bates page 10)</i>
Schnucks Market	1/9/2010	\$134.74	<i>Exhibit 55A at 1 (Bates page 10)</i>
Schnucks Market	1/21/2010	\$49.32	<i>Exhibit 55A at 1 (Bates page 10)</i>
Schnucks Market	1/24/2010	\$102.69	<i>Exhibit 55A at 1 (Bates page 10)</i>
Schnucks Market	2/5/2010	\$120.49	<i>Exhibit 56A at 1 (Bates page 16)</i>
Schnucks Market	3/2/2010	\$31.46	<i>Exhibit 57A at 1 (Bates page 24)</i>
Schnucks Market	4/9/2010	\$44.00	<i>Exhibit 58A at 1 (Bates page 28)</i>
Schnucks Market	6/20/2010	\$43.18	<i>Exhibit 60A at 1 (Bates page 37)</i>
Schnucks Market	8/9/2010	\$43.92	<i>Exhibit 62A at 1 (Bates page 43)</i>
Schnucks Market	10/26/2010	\$16.48	<i>Exhibit 64A at 1 (Bates page 47)</i>
Schnucks Market	11/22/2010	\$53.07	<i>Exhibit 65A at 2</i>
Schnucks Market	11/23/2010	\$46.61	<i>Exhibit 65A at 2</i>
Schnucks Market	12/4/2010	\$37.11	<i>Exhibit 66A at 1 (Bates page 8)</i>
Schnucks Market	12/24/2010	\$63.48	<i>Exhibit 66A at 1 (Bates page 8)</i>
Whole Foods Market	4/10/2010	\$64.66	<i>Exhibit 58A at 1 (Bates page 28)</i>
Whole Foods Market	5/27/2010	\$46.12	<i>Exhibit 59A at 1 (Bates page 35)</i>
Whole Foods Market	6/20/2010	\$68.13	<i>Exhibit 60A at 1 (Bates page 37)</i>
Whole Foods Market	8/3/2010	\$45.33	<i>Exhibit 62A at 1 (Bates page 43)</i>

2010 Food Purchases			
Payee	Date	Sum of Amount	Statement
Burger King	10/25/2010	\$5.95	<i>Exhibit 64A at 1 (Bates page 47)</i>
Captain Ds	7/27/2010	\$9.12	<i>Exhibit 61A at 1 (Bates page 39)</i>
Captain Ds	7/29/2010	\$9.76	<i>Exhibit 61A at 1 (Bates page 39)</i>
Captain Ds	11/2/2010	\$8.89	<i>Exhibit 65A at 1</i>
Five Guys	7/16/2010	\$20.44	<i>Exhibit 61A at 1 (Bates page 39)</i>
Lees Chicken	4/8/2010	\$9.14	<i>Exhibit 58A at 1 (Bates page 28)</i>
Lees Chicken	4/13/2010	\$15.98	<i>Exhibit 58A at 1 (Bates page 28)</i>
Longhorn's	11/18/2010	\$60.00	<i>Exhibit 65A at 1</i>
McDonald's	5/23/2010	\$2.48	<i>Exhibit 59A at 1 (Bates page 35)</i>
McDonald's	7/29/2010	\$11.18	<i>Exhibit 61A at 2 (Bates page 40)</i>
McDonald's	10/6/2010	\$14.28	<i>Exhibit 64A at 1 (Bates page 47)</i>
Penn Station	7/25/2010	\$22.90	<i>Exhibit 61A at 1 (Bates page 39)</i>
Red Lobster	7/22/2010	\$55.00	<i>Exhibit 61A at 1 (Bates page 39)</i>
Red Lobster	10/31/2010	\$60.00	<i>Exhibit 64A at 2 (Bates page 48)</i>
Sasha's on Shaw LLC	2/23/2010	\$30.00	<i>Exhibit 56A at 1 (Bates page 16)</i>
St Louis Bread	1/15/2010	\$20.33	<i>Exhibit 55A at 1 (Bates page 10)</i>
Sweetie Pies	1/4/2010	\$12.07	<i>Exhibit 55A at 1 (Bates page 10)</i>
Sweetie Pies	8/7/2010	\$12.07	<i>Exhibit 62A at 1 (Bates page 43)</i>
White Castle	4/6/2010	\$6.92	<i>Exhibit 58A at 1 (Bates page 28)</i>
White Castle	8/8/2010	\$18.43	<i>Exhibit 62A at 1 (Bates page 43)</i>
White Castle	11/22/2010	\$7.13	<i>Exhibit 65A at 1</i>
	TOTAL	\$1,472.57	

Appendix D

Independent Contractor Reporting				
Expenditure	Date	Reported Purpose	Amount	Report
DaVita Hanson PO Box 52177 St Louis, MO 63136	7/17/2008	Campaign Professional Services PR	\$500.00	Amended 8 day before primary 2008 <i>Exhibit 16A at 13</i>
Ingrid Owens	7/25/2008	Campaign Professional Services	\$1,118.65	Amended 30 Day After Primary 2008 <i>Exhibit 17A at 11</i>
DaVita Hanson PO Box 52177 St Louis, MO 63136	8/4/2008	Campaign Professional Services	\$1,000.00	Amended 30 Day After Primary 2008 <i>Exhibit 17A at 11</i>
DaVita Hanson PO Box 52177 St Louis, MO 63136	8/22/2008	Campaign Professional Services	\$600.00	
DaVita Hanson PO Box 52177 St Louis, MO 63136	9/9/2008	Campaign Professional Services	\$300.00	Amended October 2008 quarterly <i>Exhibit 18A at 11</i>
John Bowman 4201 Minoma St Louis, MO 63121	9/15/2008	Campaign Professional Services	\$700.00	

Independent Contractor Reporting				
Expenditure	Date	Reported Purpose	Amount	Report
DaVita Hanson PO Box 52177 St Louis, MO 63136	9/19/2008	Campaign Professional Services	\$750.00	
Debra Shurn Marketing Works 707 North Second Street St Louis, MO 63102	9/22/2008	Campaign Professional Services	\$500.00	
John Bowman 4201 Minoma St Louis, MO 63121	9/30/2008	Campaign Professional Services	\$1,300.00	
DaVita Hanson PO Box 52177 St Louis, MO 63136	10/10/2008	Campaign Professional Services	\$750.00	Amended 8 Day Before General 2008 <i>Exhibit 19A at 13</i>
Steve Chalmers 30509 Louisiana St Louis, MO 63110	10/10/2008	Campaign Professional Services	\$1,000.00	Amended 8 Day Before General 2008 <i>Exhibit 19A at 13</i>
DaVita Hanson Marketing Works PO Box 52177 St Louis, MO 63136	10/15/2008	Campaign Professional Services	\$1,000.00	

Independent Contractor Reporting				
Expenditure	Date	Reported Purpose	Amount	Report
John Bowman 4201 Minoma St Louis, MO 63121	10/20/2008	Campaign Professional Services	\$2,500.00	
DaVita Hanson PO Box 52177 St Louis, MO 63136	10/24/2008	Campaign Professional Service	\$750.00	Amended 30 Day After General 2008 <i>Exhibit 20 at 10</i>
Gateway Alarm Inc 5923 Weber Road St Louis, MO 63123	10/24/2008	Campaign Professional Services	\$300.00	
Cheryl Dozier 911 Lafayette Jefferson City, MO 65102	10/28/2008	Campaign Professional Services	\$180.59	Amended 30 Day After General 2008 <i>Exhibit 20 at 10</i>
John Bowman 4201 Minoma St Louis, MO 63121	10/28/2008	Campaign Professional Services	\$5,000.00	
Ingrid Owens	11/10/2008	Campaign Professional Services	\$1,376.11	Amended 30 Day After General 2008 <i>Exhibit 20 at 11</i>
DaVita Hanson PO Box 52177 St Louis, MO 63136	11/18/2008	Campaign Professional Services	\$500.00	

Independent Contractor Reporting				
Expenditure	Date	Reported Purpose	Amount	Report
Carmen & Associates	11/20/2008	Campaign Professional Services	\$348.00	
DaVita Hanson PO Box 52177 St Louis, MO 63136	11/20/2008	Campaign Professional Services	\$500.00	
DaVita Hanson PO Box 52177 St Louis, MO 63136	11/25/2008	Campaign Professional Services	\$500.00	
John Bowman 4201 Minoma St Louis, MO 63121	11/28/2008	Campaign Professional Services	\$2,500.00	
John Bowman 4201 Minoma St Louis, MO 63121	12/3/2008	Campaign Professional Services	\$1,000.00	Amended January 2009 quarterly <i>Exhibit 21A at 7</i>
Cheryl Dozier & Assoc. 911 Lafayette Jefferson City, MO 65102	12/8/2008	Campaign Professional Services	\$680.59	Amended January 2009 quarterly <i>Exhibit 21A at 7</i>
DaVita Hanson PO Box 52177 St Louis, MO 63136	12/24/2008	Campaign Professional Services	\$250.00	

Independent Contractor Reporting				
Expenditure	Date	Reported Purpose	Amount	Report
DaVita Hanson PO Box 52177 St Louis, MO 63136	3/2/2009	Campaign Professional Services	\$250.00	Amended April 2009 quarterly <i>Exhibit 22A at 9</i>
DaVita Hanson PO Box 52177 St Louis, MO 63136	3/23/2009	Campaign Professional Services	\$250.00	
Political Resources & Solutions, LLC PO Box 771731 St Louis, MO 63117	4/15/2009	Campaign Professional Service	\$200.00	Amended July 2009 quarterly <i>Exhibit 23A at 12</i>
DaVita Hanson PO Box 52177 St Louis, MO 63136	5/11/2009	Campaign Professional Services	\$350.00	Amended July 2009 quarterly <i>Exhibit 23A at 12</i>
Ronnie Richardson Assoc. Jefferson City, MO	6/1/2009	Campaign Professional Services	\$1,500.00	
Maida Coleman 1800 Dolman St Louis, MO 63104	6/9/2009	Campaign Professional Services	\$250.00	
Maida Coleman 1800 Dolman St Louis, MO 63104	6/22/2009	Campaign Professional Service	\$250.00	

Independent Contractor Reporting				
Expenditure	Date	Reported Purpose	Amount	Report
DaVita Hanson PO Box 52177 St Louis, MO 63136	7/1/2009	Campaign Professional Services	\$1,500.00	Amended October 2009 quarterly <i>Exhibit 24A at 14</i>
Ronnie Richardson Assoc. Jefferson City, MO	7/2/2009	Campaign Professional Services	\$1,500.00	
Cheryl Dozer & Associates 911 Lafayette Jefferson City, MO 65102	7/20/2009	Campaign Professional Services	\$200.00	
DaVita Hanson PO Box 52177 St Louis, MO 63136	8/4/2009	Campaign Professional Services	\$1,500.00	
Ronnie Richardson Assoc. Jefferson City, MO	8/5/2009	Campaign Professional Services	\$1,500.00	
John Bowman 4201 Minoma St Louis, MO 63121	8/10/2009	Campaign Professional Services	\$1,000.00	
John Bowman 4201 Minoma St Louis, MO 63121	9/4/2009	Campaign Professional Services	\$400.00	

Independent Contractor Reporting				
Expenditure	Date	Reported Purpose	Amount	Report
Jasonee Ragland 1375 North Highway Drive Fenton, MO 63026	8/25/2009	Campaign Professional Services	\$125.00	Amended October 2009 quarterly <i>Exhibit 24A at 15</i>
Cheryl Dozer & Associates 911 Lafayette Jefferson City, MO 65102	9/17/2009	Campaign Professional Fees	\$200.00	
Cheryl Dozer & Associates 911 Lafayette Jefferson City, MO 65102	9/21/2009	Campaign Professional Services	\$200.00	Amended October 2009 quarterly <i>Exhibit 24A at 15</i>
Jasonee Ragland 1375 North Highway Drive Fenton, MO 63026	9/22/2009	Campaign Professional Services	\$746.78	
Ronnie Richardson Assoc. Jefferson City, MO	9/24/2009	Campaign Professional Services	\$1,500.00	
Ronnie Richardson Assoc. Jefferson City, MO	10/29/2009	Campaign Professional Service	\$1,000.00	Amended January 2010 quarterly <i>Exhibit</i>

Independent Contractor Reporting				
Expenditure	Date	Reported Purpose	Amount	Report
Ronnie Richardson Assoc. Jefferson City, MO	11/17/2009	Campaign Professional Service	\$1,500.00	25A at 12
Cheryl Dozer & Assoc. 911 Lafayette Jefferson City, MO 65102	12/7/2009	Campaign Professional Service	\$400.00	
Ronnie Richardson Assoc. Jefferson City, MO	12/24/2009	Campaign Professional Service	\$1,500.00	
Cheryl Dozer & Associates 911 Lafayette Jefferson City, MO 65102	1/29/2010	Campaign Professional Services	\$400.00	Amended April 2010 quarterly Exhibit 26A at 8
Phillip Berry 4122 San Francisco St Louis, MO 63115	2/1/2010	Campaign Activity	\$350.00	
		TOTAL	\$44,295.13	

Respondent's Exhibit 157; Tr. at 107-110.